

Illinois Tool Works Inc.
Corporate Headquarters
155 Harlem Avenue
Glenview, Illinois 60025
Telephone 847.724.7500

US EPA RECORDS CENTER REGION 5



April 6, 2015

RECEIVED APR 07 2015 *Ad ESS #2*

Margaret Herring, Civil Investigator
U.S. Environmental Protection Agency, Region 5
Superfund Division
Enforcement and Compliance Assurance Branch (SE-5J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: CERCLA 104(e) Information Request to Hobart Corporation
South Dayton Dump & Landfill Site - Moraine, Ohio

Dear Ms. Herring:

I am writing in response to the 104(e) Information Request ("104(e) Request") regarding Hobart Corporation and Hobart Food Equipment Group (collectively, "Hobart") which was included in the January 16, 2015 Special Notice Letter addressed to Illinois Tool Works Inc. ("ITW") for the site described above ("Site"). Hobart Corporation was acquired by ITW in 1999 and is currently a subsidiary of ITW. Hobart did business as Hobart Food Equipment Group at times during its operating history. ITW has prepared the enclosed responses on behalf of Hobart.

Please direct all questions and correspondence regarding this Site to Ken Brown at:

Illinois Tool Works Inc.
155 Harlem Avenue
Glenview, IL 60025

Phone: (224) 661-7784
Fax: same as above
E-mail: kbrown@itw.com

Notwithstanding our responses to the 104(e) Request, neither Hobart nor ITW admits any liability nor waive any rights in this matter or possible defenses to liability at the Site.

Sincerely,

Ken Brown, CHMM
Manager of Environmental
& Chemical Compliance

Enclosures

**General objections of Hobart
to 104(e) Request dated January 16, 2015
in regard to the Site**

1. Hobart objects to the 104(e) Request to the extent it seeks information contained in documents readily available to U.S. EPA from the files of federal, state, and local agencies.
2. Hobart objects to the 104(e) Request to the extent that it is unduly burdensome, oppressive, overly broad, and unreasonable.
3. Hobart objects to the 104(e) Request to the extent it seeks information protected by the attorney-client privilege, the attorney work-product doctrine, or any applicable privilege or rule that protects such information from disclosure.
4. Hobart objects to the 104(e) Request to the extent it seeks information that is not calculated to discover information relevant to the Site.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Ken Brown
Manager of Environmental
& Chemical Compliance
Illinois Tool Works Inc.

4/6/2015

Date

RESPONSES TO 104(e) REQUEST QUESTIONS

1. Persons Consulted:

Ken Brown, Manager of Environmental & Chemical Compliance, ITW
Tracie Kimrie, Human Resources Assistant, ITW Food Equipment Group
Debra Wilson, Paralegal, ITW Food Equipment Group

NOTE: See also persons listed in the response to question 1 of the 104(e) Request responses regarding the Site dated May 31, 2002 ("2002 Responses"). The 2002 Responses are included in Attachment A to these responses. Additional persons were consulted in 2002 as described in the October 14, 2002 correspondence from Steve Adams to Ken Brown ("October 2002 Memo") which is also included in Attachment A.

2. Documents Consulted:

Documents regarding the information requested per 104(e) Request questions 5 through 23 are not available for all years of operation of all relevant facilities. The following responses are based upon available documents. Available documents are included in Attachment A to these responses.

3. Persons Able to Provide a More Detailed Response:

Based upon current information search efforts and research conducted since the 2002 Responses, Hobart has not identified persons that it has reason to believe are able to provide more detailed or complete responses other than those already identified to the U.S. Environmental Protection Agency ("EPA"). Hobart and other participating Potentially Responsible Parties ("PRPs") have shared relevant information with EPA from litigation involving recalcitrant PRPs at the Site.

4. Names, Addresses, Telephone Numbers, & E-mail Addresses:

The current and former Hobart or ITW employees identified below are represented by counsel. Any contact with those persons should be arranged through counsel.

Current Hobart or ITW Employees:

Ken Brown, CHMM
Manager of Environmental
& Chemical Compliance
Illinois Tool Works Inc.
155 Harlem Avenue
Glenview, IL 60025

Phone: (224) 661-7784
E-mail: kbrown@itw.com

RESPONSES TO 104(e) REQUEST QUESTIONS

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Former Hobart Employees:

NOTE: Information for persons previously consulted and identified in the 2002 Responses and October 2002 Memo is provided below. Information is based on last known address and/or phone number in Hobart files.

Steve Adams
7125 Zerkle Road
Springfield, OH 45502

Phone: (937) 964-0211

William Anthony
1025 W Springbrok Ln
Piqua, OH 45356

Phone: (937) 778-1428

Joseph Bedwell
6014 Cinnamon Tree C
Englewood, OH 45322

Date of Death: 3/26/2005

Jim (James) Carleton
3190 S Old State Rd
Delaware, OH 43015

Date of Death: 2/6/2006

Harley Cyphers
5461 Karafit Rd.
Celina, OH 45822

Date of Death: 6/9/2006

Robert Davis
7545 Coffin Station Road
Springfield, OH 45502

Phone: (937) 964-1647

Fred McIntosh
Known to be deceased.

Date of Death: not found in Hobart files

Steve Pettit
564 Shaftsbury Road
Troy, OH 45373

Phone: (937) 335-1370

Lester Rosell
711 Broadmoor Dr.
Dayton, OH 45419

Date of Death: 4/24/2002

Melvin Swiger
6704 Stahl Rd.
Greenville, OH 45331

Phone: not found in Hobart files

RESPONSES TO 104(e) REQUEST QUESTIONS**Page 3 of 6**

Mark Wright
Known to be deceased.

Date of Death: not found in Hobart files

Former Waste Transporter:

Emery Joseph Sepeck
Known to be deceased.

Date of Death: not determined

5. Dates Materials Sent to Site

The only documentation indicating that Hobart waste materials were brought to the Site is contained in an April 10, 1984 letter from Hobart to the Ohio Environmental Protection Agency ("April 1984 Letter"). The April 1984 Letter reports that Emery Joseph Sepeck, a waste transporter who operated in the Dayton area, stated that he took waste materials from two Hobart facilities in Dayton (448 Huffman Avenue and 216 South Torrence Street) to the Blalock Landfill and the Site. The following two shipments were reportedly transported by Mr. Sepeck:

<u>Waste Description</u>	<u>Amount</u>	<u>Date</u>
solvents/oil/water	550 gallons	3/17/1976
solvents/oil/water	770 gallons	7/19/1976

According to the April 1984 Letter, Hobart waste materials were brought to the Blalock Landfill and the Site. The letter provides no information regarding the fraction of the waste material described above which might have been actually taken to the Site. The April 1984 Letter and additional internal Hobart correspondence regarding waste material generation and disposal in the 1970s and 1980s by the Hobart facilities in Dayton are included in Attachment A.

6. Respondent Owned, Leased, or Operated Vehicles

No documentation has been found which indicates Hobart hauled or sent materials to the Site in vehicles it owned, leased, or operated.

7. Permits & Registrations for Transport &/or Disposal of Materials

The following hazardous waste identification numbers were issued to the two Hobart facilities in the Dayton described in the response to question 5:

<u>Hobart Facility</u>	<u>U.S. EPA Identification #</u>
448 Huffman Avenue ("Huffman Facility")	OHD004237434
216 South Torrence Street ("Torrence Facility")	OHD071275630

RESPONSES TO 104(e) REQUEST QUESTIONS

Page 4 of 6

No documentation has been found which indicates Hobart facilities in Dayton had permits for the transport or disposal of waste materials.

8. Shipments or Arrangements per Each Permit

As stated in the response to question 7, no permits for transportation and disposal of waste materials have been located for the Hobart facilities in Dayton. Hazardous waste identification numbers relative to the generation of waste materials were issued as stated in the response to question 7. Information regarding arrangements and shipments from the Hobart facilities in Dayton is provided in the April 1984 Letter and additional internal Hobart correspondence included in Attachment A.

9. Hazardous Substances Transportation

Information regarding waste material transporters and disposal sites utilized by the Hobart facilities in Dayton is provided in the April 1984 Letter and additional internal Hobart correspondence provided in Attachment A.

10. Permits & Registrations for Disposal of Wastes

See responses to questions 7 through 9.

11. Permits issued under Resource Conservation & Recovery Act ("RCRA")

See response to question 7.

12. Notification of Hazardous Waste Activity

See response to question 7. The original Notifications of Hazardous Waste Activity for the Hobart facilities in Dayton were not located.

13. Individuals with Responsibility for Hobart Environmental Matters

See the April 1984 Letter, 2002 Responses, and October 2002 Memo in Attachment A.

14. Waste Container Information

Available documentation indicates that the only containers utilized for waste material were 55-gallon drums.

15. Contracts, Agreements, or Arrangements for Disposal, Treatment, or Recycling

No such contracts or agreements have been located. See response to question 9 regarding arrangements for disposal, treatment, or recycling of waste materials.

RESPONSES TO 104(e) REQUEST QUESTIONS

Page 5 of 6

16. Copies of Contracts for Disposal, Treatment, or Recycling

No such contracts or agreements have been located. See response to question 9 regarding arrangements for disposal, treatment, or recycling of waste materials. No specific information regarding waste disposal into drains at the Hobart facilities in Dayton has been determined. Environmental site assessment reports from 1988 (Torrence Facility) and 1995 (Huffman Facility) indicate that the Hobart facilities in Dayton had sanitary sewer service from Montgomery County. The environmental site assessment reports are included in Attachment A.

17. RCRA Identification Numbers

See response to question 7.

18. Federal Offices for Filing of Hazardous Substance or Waste Information

Hazardous substance and waste information was filed with EPA Region 5 in Chicago, Illinois. See Appendix I of the Huffman Facility environmental site assessment report.

19. Years Hazardous Substance or Waste Information Filed to Federal Offices

A filing in 1981 was located - see response to question 18.

20. State Offices for Filing of Hazardous Substance or Waste Information

State offices included the Southeast and Southwest Regions of Ohio Environmental Protection Agency in Logan and Dayton, Ohio, respectively.

21. Years Hazardous Substance or Waste Information Filed to State Offices

Documents located were filed in 1981 and 1984.

22. Federal & State Environmental Laws & Regulations Reported Under

Hobart facilities in Dayton reported under the Comprehensive Environmental Response, Liability, & Compensation Act ("CERCLA") and the Resource Conservation & Recovery Act ("RCRA"). These facilities reported under federal and state regulations established pursuant to CERCLA and RCRA.

23. Federal & State Offices with which Environmental Reports Filed

See responses to questions 18 through 21.

RESPONSES TO 104(e) REQUEST QUESTIONS

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NOTE TO RESPONSES:

Hobart understands that EPA considers the area of interest (undefined in the Special Notice Letter) to be within 50 miles of the Site. Hobart currently and formerly operated facilities in Troy, Ohio which is within 50 miles of the Site. A list of these facilities is included in Attachment A. Based upon current information search efforts and research conducted since the 2002 Responses, Hobart has not identified any documentation or other indication that waste materials from any Troy facility were brought to the Site.

Attachment A

Documents

Index to Documents

1. 2002 Responses
2. October 2002 Memo
3. April 1984 Letter
4. Internal Hobart Correspondence Regarding Waste Material Generation and Disposal
5. Huffman Facility Environmental Site Assessment Report - 1995
6. Torrence Facility Environmental Site Assessment Report - 1988
7. List of Hobart Facilities in Troy, Ohio

ITW Food Equipment Group

Safety & Environmental Department

Steve Adams, Manager Safety & Environmental
ITW Food Equipment Group
701 S. Ridge Avenue
Troy, Ohio 45374

Phone: 937-332-2716
Fax: 937-332-2520
E-mail: Steve.Adams@itwfeg.com

May 31, 2002

U.S. Environmental Protection Agency
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, Illinois 60604

**RE: The South Dayton Dump, 1976 Dryden Road (aka) Springboro Pike, Moraine, Ohio
General Notice of Potential Liability and Request for Information, CERCLA 104 (e) request.**

Dear Ms. Sheppard-Johnson,

This document is in response to the 104(e) request initially received in early April 2002 by ITW Hobart Brothers Company, f/k/a Hobart Brothers, 101 Trade Square East, Troy, Ohio 45313. After receiving the response to a Freedom of Information Act request that was submitted to U.S. EPA subsequent to receipt of the 104(e) request, it was determined that the request should have been addressed to Hobart Corporation, 701 S. Ridge Ave., Troy, Ohio 45374. Mr. Tom Nash was contacted on 5/9/02 requesting an extension of time due to the transfer of documents to Hobart Corporation. Mr. Nash granted an extension until May 31, 2002 for submittal of the Hobart Corporation response.

Pursuant to Section 104 (e) of the Comprehensive Environmental Response Compensation and Liability Act, the following information is being provided. Hobart Corporation is one of the entities that you have identified as a PRP. Hobart Corporation is now known as ITW Food Equipment Group L.L.C. Illinois Tool Works (ITW) Inc., Glenview, Illinois, is the managing member of the L.L.C.

Description:

The Hobart Corporation facility, 216 South Torrence Street, Dayton, Ohio, was located at this address in the City of Dayton, Ohio, Montgomery County. This facility consisted of office and manufacturing floor space totaling approximately 129,000 sq.ft. The business was known as 'Dayton Scale Plant'. The building was purchased in 1966 and remained in operation by Hobart until December 1987. In 1987, manufacturing was moved to Hillsboro, Ohio and the building was sold. During its time of operation, the facility's EPA I.D. # was OHD004237434.

The Hobart Corporation facility, 448 Huffman Avenue, Dayton, Ohio was also located at this address in the City of Dayton, Ohio, Montgomery County. This facility consisted of approximately 167,000 sq.ft. of office and manufacturing space. It was known as 'Dayton Scale Division'. The building was purchased in 1934 and was in operation as a manufacturing plant until 1982. In 1982, manufacturing ceased, and the building was used as a Parts Distribution Center until it was closed and sold in September of 1995. This facility's EPA I.D.# is OHD071275630.

Additional Information & Fact Finding Process

Both locations listed above were a combination of manufacturing plants and parts distribution facilities for commercial food equipment produced by Hobart. The generation of waste was limited to small quantities of waste oil, coolant, paint and paint cleanup material. These locations were 'sister' plants and it was common for them to share various manufacturing processes and resources, which included the collection of waste streams for disposal.

Hobart Corporation has been linked to the South Dayton Landfill by documents submitted to Ohio EPA by Hobart, in 1984. Information contained in these various documents reveal that wastes were transported by a Mr. Joe Sepeck to the South Dayton site. The report dated April 10, 1984, and its attachments Exhibits III & IV, provides the most comprehensive information available on record, regarding Hobart's involvement at this location.

Due to the closing of both facilities several years ago, the only documentation that exists is plant files that were sent to our Records Retention Department in Troy, Ohio for storage. These documents have been retrieved from storage and each box was reviewed to determine if any data exists regarding the disposal of solid, liquid or hazardous waste from either location. Certain documents were recovered that represent the facilities annual reporting status to Ohio EPA. No additional documents were located that provide additional disposal information that is not already in the possession of U.S. EPA.

We have also attempted to conduct interviews with current and former employees to gather information they may possess regarding disposal practices. Many of the former employees with management responsibilities at these sites are deceased. We will continue our 'good faith' search and will supplement this response if we find additional relevant information.

Summary

ITW Food Equipment Group L.L.C. f/k/a Hobart Corporation wishes to explore negotiation towards a reasonable resolution of any potential liability with U.S. EPA and other potentially responsible parties for the South Dayton Dump site. By agreeing to work with a PRP group to resolve any potential liabilities, ITW Food Equipment Group L.L.C. does not admit any liability nor does it waive any possible defenses to liability in the event the parties fail to reach an agreement.

I certify under penalty of law that this document and any attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Stephen C. Adams, Manager Safety & Environmental

5/31/02

Date

ANSWERS

ENCLOSURE 2 - QUESTIONS

- 1) **Persons contacted:**
 - Stephen C. Adams, Manager Safety & Environmental, ITW Food Equipment Group (dba Hobart Corporation)
 - James Carleton, Director of Safety & Environmental, Hobart Corporation, retired.
 - Robert Davis, Facilities Engineer, Hobart Corporation
 - Joseph Bedwell, Plant Engineer
 - Ken Brown, Environmental Engineer, Illinois Tool Works Inc.

- 2) **Document review:**
 - Facility document from both locations were retrieved from Records Retention Department, ITW Food Equipment Group L.L.C., Troy, Ohio. Documentation consisted of environmental files, safety files, training records, and some purchase orders.
 - Documents provided by U.S. EPA, which were on record with Ohio EPA regarding waste generation at the Hobart Dayton locations.

- 3) **Other person with info:**
 - No other 'living' persons known that could provide additional information

- 4) **EPA Identification #:**
 - Hobart – Torrence Street ODD004237434
 - Hobart – Huffman Avenue ODD071275630

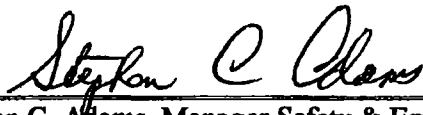
- 5) **Acts or omissions:**
 - ITW Food Equipment Group L.L.C. lacks knowledge or information regarding the specific operations of this Site, or the acts and omissions of any person, and therefore has no basis upon which to respond to this question. ITW Food Equipment Group L.L.C. had no direct or indirect involvement in the daily operation or decision-making relating to this Site.

- 6) **Knowledge of Site:**
 - No 'living' person known with knowledge regarding waste generation, collection or disposal.
 - a. Mark Wright Plant Manager, deceased
 - b. Fred McIntosh, Maintenance Manager, deceased
 - c. Les Rosell, Manager Facilities Engineering, deceased

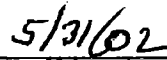
- 7) **Dates Engaged in any of the following Activities:**
- **Generation of waste sent to South Dayton Landfill**
 1. 1973-1976
 - **Transportation of materials to South Dayton Landfill**
 1. 1973-1976
- 8) **Persons who may have arranged for disposal of waste or transportation:**
- Les Rosell, Manager Facilities Engineering, deceased
 - Fred McIntosh, Maintenance Manger, deceased
 - Dates of disposal by Joe Sepeck, hauler, deceased:
 1. 3/17/76, 550 gallons, waste solvent, oil & water. Hauler was Joe Sepeck. Cost of disposal \$50.
 2. 7/19/76, 770 gallons, waste solvent, oil & water. Hauler was Joe Sepeck. Cost of disposal \$70.
- 9) **Liability Insurance Policies:**
- A table of Hobart Corporation liability insurance policies is being compiled and will be submitted within two weeks of the date of this letter.
- 10) **Copies of Income Tax Returns:**
- Copies of Hobart Corporation's tax returns for 1996 through 2000 are attached, and listed as Appendix B, Item #B10. The 2001 return was not available at this time.
- 11) **Articles of Incorporation:**
- a. The L.L.C. agreement for the current potentially responsible legal entity, ITW Food Equipment Group L.L.C., is attached, listed as Appendix B, item #B11(a). Also attached is a certificate of amendment to the certificate of formation of ITW Food Equipment Group L.L.C.
 - b. Financial statements for the past five fiscal years are attached, listed as Appendix B, item #B11(b). These statements are for the managing member of the L.L.C., Illinois Tool Works Inc.
 - c. Information regarding current assets and liabilities is attached. Illinois Tool Works Inc. is responsible for these assets and liabilities, listed as Appendix B, item #B11(c).
 - d. The managing member of the L.L.C. is Illinois Tool Works Inc. All subsidiaries of Illinois Tool Works Inc. are identified in Exhibit 21 of the reports provided for Item 11.b, listed as Appendix B, item #B11(b).
- 12) **Partnership:**
- No partnership involved.
- 13) **Trust:**
- No trust involved

I certify under penalty of law that this document and any attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Stephen C. Adams, Manager Safety & Environmental



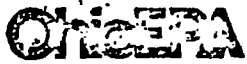
Date

Appendix A

- 1) 1982 Ohio Hazardous Waste Report and Part A submittal – Appendix A, Item #A1
- 2) 1983 Generator Annual Hazardous Waste Report – Appendix A, Item #A2
- 3) 1984 Ohio Hazardous Waste Report reminder letter and acknowledgement – Appendix A, Item #A3
- 4) 1985 Ohio Hazardous Waste Report reminder letter and acknowledgement – Appendix A, Item #A4
- 5) 1986 Ohio Hazardous Waste Report reminder letter and acknowledgement – Appendix A, Item #A5
- 6) 1991 Ohio Hazardous Waste Report reminder letter and acknowledgement – Appendix A, Item #A6
- 7) 1992 Ohio Hazardous Waste Report reminder letter and acknowledgement – Appendix A, Item #A7

Appendix B

- 1) **Question # 10** - Copies of all income tax returns for past five years – **Appendix B, item #B10.**
- 2) **Question # 11(a)** - ITW Food Equipment Group L.L.C. agreement – **Appendix B, Item #B11(a).**
- 3) **Question # 11(b)** - Financial statements, ITW Food Equipment Group, last five years – **Appendix B, Item #B11(b).**
- 4) **Question # 11(c)** - Information regarding current assets and liabilities, Illinois Tool Works Inc. – **Appendix B, Item #B11(c).**
- 5) **Question # 11 (d)** - Identification of all subsidiaries of Illinois Tool Works Inc. – **Appendix B, Item #B11(b).**



State of Ohio Environmental Protection Agency

HAZARDOUS WASTE REPORT

I. TYPE OF HAZARDOUS WASTE REPORT

PART A: GENERATOR ANNUAL REPORT

This report is for the year ending Dec. 31.

1981

Instructions: "Installation" means a single site where hazardous waste is generated, treated, stored, or disposed of. Please refer to the specific instructions included with this form for generators or facilities before completing this form. The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

Please print or type with ELITE type (12 characters per inch)

II. INSTALLATIONS USEPA I.D. NUMBER

FOHDO712756301

III. NAME OF INSTALLATION

HOBART CORPORATION

IV. INSTALLATION MAILING ADDRESS

3448 HUFFMAN AVENUE

Street or P.O. Box

4 DAYTON

City or Town

OH 45403

State

Zip Code

V. LOCATION OF INSTALLATION

5448 HUFFMAN AVENUE

Street or Route number

57

County Code

6 DAYTON

City or Town

OH 45403

State

Zip Code

53 56

Primary SIC Code

VI. INSTALLATION CONTACT

2 MCINTOSH FRED T.

Name (last and first)

513-254-8451

Phone No. (area code & no.)

VII. TRANSPORTATION SERVICES USED (for part A reports only)

List the USEPA identification numbers for those transporters whose services were used during the reporting year represented by this report.

OH 000608588
ENVIRONMENTAL PROCESSING SERVICES
1288 MCCOOK AVENUE
DAYTON, OHIO 45404
513-222-1062

VIII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

FRED T. MCINTOSH

A. Print or type name

Fred T. McIntosh

B. Signature

3-30-82

C. Date signed



State of Ohio Environmental Protection Agency

GENERATOR ANNUAL REPORT — PART A

EPA 9011

FOR OFFICIAL
USE ONLY
(Items 1 and 2)

1. DATE RECEIVED

11/19

2. TYPE OF REPORT

IX. GENERATOR'S USEPA I.D. NO.

G0HDD0712756301

X. FACILITY'S USEPA I.D. NO.

0HDD000608588

XI. FACILITY NAME (specify)

ENVIRONMENTAL PROCESSING SERVICE

XII. FACILITY ADDRESS

1282 MCCOOK AVENUE

Street or P.O. Box

DAYTON

City or town

0445404

State

Zip Code

XIII. WASTE IDENTIFICATION

Line Number	A. Description of Waste	B. DOT Hazard Class	C. USEPA Hazardous Waste Number (see instructions)				D. Amount of Waste				E. Unit of Measure (enter code)
			30	33	34	37					
1	SPENT STODDARD	07			0001				3990		P
2	CHLOROTHANE VG	09			P002				350		P
3	PAINT THINNER	07			E005				110		P
4											
5											
6											
7											
8											
9											
0											
1											
2											

IV. COMMENTS (enter information by line number — see instructions)

38 — 41 42 — 45

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

For the calendar year ending December 31, 1983

The information requested herein is required by Rules 3745-52-41, 3745-54-75 and 3745-55-75 as applicable of the Ohio Administrative Code.

REFER TO THE SPECIFIC INSTRUCTIONS CONTAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM.

Please print/type with elite type (12 characters per inch)

1. GENERATOR'S EPA I.D. NUMBER

T/AC

F	0	4	0	0	7	1	2	7	5	6	3	6			1
1	2											13	14	15	

II. NAME OF INSTALLATION

30 H O B A G E T C E B A P O E K A N I S A P / A M T 113 67

III. INSTALLATION MAILING ADDRESS

15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45

Street or P.O. Box

41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

City or Town

State Zip Code

IV. LOCATION OF INSTALLATION

5 2 16 50 2 7 4 7 2 2 2 7 4 6 6 5 7

15 16 45

٤١٢

County Code

[illegible]

City or Town

State Zip Code

5576

Primary SiC Code

V. INSTALLATION CONTACT

2 MC / MARKSW. ANSW. 15 16 45

Name (last and first)

513-2541-6151

Phone No. (area code & no.)

VI. TRANSPORTATION SERVICES USED List the name and EPA identification numbers of all hazardous waste transporters whose services were used during the reporting year.

ENVIRONMENTAL PROCESSING SERVICE
64D000602582

1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 2674, 2675, 2676, 2677, 2678, 2679, 26

100 5 001

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SAFETY AND ENVIRONMENTAL

Print/Type Name

Title

Signature of Authorized Representative _____

Date Signed

For the calendar year ending December 31, 19 83

83

(Specify facility to which all wastes on this page were sent)

T/AC

[illegible]

X. FACILITY NAME

C H D C O O b O P S E U

28 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59

XI. FACILITY'S ADDRESS

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
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Street or P.O. Box

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City or Town

State Zip Code

XII. WASTE IDENTIFICATION

XII. WASTE IDENTIFICATION									
LINE NUMBER	A. DESCRIPTION OF WASTE	B. DOT HAZARD CLASS		C. USEPA HAZARDOUS WASTE NUMBER (See Instructions)	D. AMOUNT OF WASTE	E. UNIT OF MEASURE (Enter Code)			
1	WASTE 11- TRICHLOROETHANE	0	9	1012	1111111111	P			
2	HAZARDOUS LIQUID - NOS. (STODOLSKY SOLVENT)	0	1	1011	1111111111	P			
3					1111111111				
4					1111111111				
5					1111111111				
6					1111111111				
7					1111111111				
8					1111111111				
9					1111111111				
10					1111111111				
11					1111111111				
12					1111111111				

XIII. COMMENTS (enter information by section number)

Small quantity generator, WE DO NOT EXCEED 1000 Kg.
ON SITE AT ANY ONE TIME



WORLD HEADQUARTERS

TROY, OHIO 46074

February 4, 1985

TO : Sammy Carothers - Chambers
 Norman Barker - Chicago Heights
 Claude E. Macemore - Columbia
 Fred McIntosh - Dayton Scale
 ✓ Paul Rethlake - Greenville
 ✓ Lynn Sonner - Hillsboro
 Kenton Hider - Kansas City
 Lee Borman - Louisville
 Johnie Cooper - Montgomery
 ✓ Everett Scott - Mt. Sterling
 Arthur Roberts - Richmond Hill
 David Dietrick - Troy, Plant #11
 William Croner - Troy, Plant #27
 John Johnson - West Liberty

COPIES TO
 J.M. Delaney
 C.R. Foxx
 R.J. Kreider
 R.D. Leytze
 L.G. Snyder
 T.W. Stokes
 B.A. Wright

FROM : James J. Carleton

SUBJECT: Annual Reporting Requirements Under RCRA

The annual Hazardous Waste Report will be due to your State EPA by March 1, 1985 for the period beginning January 1, 1984 and ending December 31, 1984.

Please submit the report, if required, in a timely manner and advise me by following the instructions below.

If you have any questions concerning the Annual Report, please contact me in Troy.

James J. Carleton
 James J. Carleton

JJC/sma

☐ Yes. An Annual Report is required and a copy is attached.

☒ No. We do not generate sufficient hazardous waste and therefore do not need to file an annual report.

☐ Other. (explain) _____

RECEIVED

MAR 1 1985

SAFETY & ENVIRONMENTAL
PROTECTION

F. McIntosh
 SIGNED

2-27-85
 DATE

#13 Dayton Scale
 PLANT



Appendix A, Item # A4

WORLD HEADQUARTERS TROY, OHIO 45374 513 335-7171

February 10, 1986

TO: Norman Barker, Chicago Heights
Fred McIntosh, Dayton Scale
Lynn Sonnen, Hillsboro
Kenton Hider, Kansas City
Johnie Cooper, Montgomery
Arthur Roberts, Richmond Hill
Steve Adams, Troy, Plant #11
William Greiner, Troy, Plant #27
John Johnson, West Liberty

Copies To:
C.R. Fox
H.J. Kreider
I.D. Leytze
T.W. Stokes
E.A. Wright

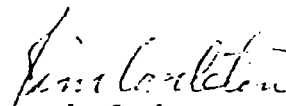
FROM: James J. Carleton

SUBJECT: Annual Reporting Requirements Under RCRA

The annual hazardous waste report will be due to you State EPA by March 1, 1986 for the period beginning January 1, 1985 and ending December 31, 1985.

Please submit the report, if required, in a timely manner and advise me by following the instructions below.

If you have any questions concerning the Annual Report, please contact me in Troy.



James J. Carleton

JJC/sr:

- ☐ Yes. An Annual Report is required and a copy is attached.
- ☐ No. We do not generate sufficient hazardous waste and therefore do not need to file an annual report.

☐ Other. (explain) _____

RECEIVED


SIGNED

2-11-86
DATE

413-10103
PLANT

SAFETY & ENVIRONMENTAL

EQUIPMENT, SYSTEMS AND SERVICES FOR THE WORLD'S FOOD INDUSTRY... KITCHENAID APPLIANCES FOR THE HOME... IN OVER 100 COUNTRIES



Appendix A, item #A5

WORLD HEADQUARTERS

TROY, OHIO 45374

January 22, 1987

TO: Norman Barker, Chicago Heights
Fred McIntosh, Dayton Scale
Lynn Sonner, Hillsboro
Kenton Hider, Kansas City
Don Garrett, Montgomery
Arthur Roberts, Richmond Hill
Doug Noren, Stero
Steve Adams, Troy, Plant #11
William Croner, Troy, Plant #27
John Johnson, West Liberty
John Taylor, Vulcan Hart

COPIES TO:

C. R. Foxx
R. J. Kreider
R. D. Leytze
T. W. Stokes
B. A. Wright

FROM: James J. Carleton

SUBJECT: Annual Reporting Requirements Under RCRA

The annual Hazardous Waste Report will be due to your State EPA by March 1, 1987 for the period beginning January 1, 1986 and ending December 31, 1986.

Please submit the report, if required, in a timely manner and advise me by following the instructions below.

If you have any questions concerning the Annual Report, please contact me in Troy.

RECEIVED

Jim Carleton
James J. Carleton

SALES DEPARTMENT

/km

☐ Yes. An Annual Report is required and a copy is attached.

☒ No. We do not generate sufficient hazardous waste and therefore do not need to file an annual report.

☐ Other. (Explain) _____

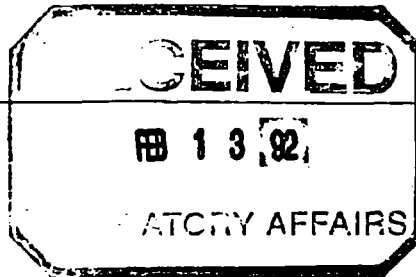
Fred McIntosh
SIGNED

2/23/87
DATE

Dayton #13
PLANT

**PREMARK
INTERNATIONAL**

James J. Carleton
Director, Regulatory Affairs



Premark International, Inc.
1717 Deertfield Road
Deerfield, Illinois 60015
513-332-2297

DATE: February 1, 1992
TO: Distribution List
SUBJECT: ANNUAL REPORTING REQUIREMENTS UNDER RCRA

The annual Hazardous Waste Report will be due to your State EPA by March 1, 1992 for the period beginning January 1, 1991 and ending December 31, 1991.

Please submit the report, if required, in a timely manner and advise me by following the instructions below.

If you have any questions concerning the Annual Report, please contact me in Troy.

A handwritten signature in cursive script, appearing to read "Jim Carleton".

James J. Carleton

- ☐ Yes. An Annual Report is required and a copy is attached.
- ☒ No. We do not generate sufficient hazardous waste and, therefore, do not need to file an Annual Report.
- ☐ Other. (Explain) _____

A handwritten signature in cursive script, appearing to read "Joseph J. Redwell".

Signed

2-14-92
Date

PRO DAYTON
Plant

/bts

PREMARK INTERNATIONAL

James J. Carleton
Director, Regulatory Affairs

Premark International, Inc.
1717 Deerfield Road
Deerfield, Illinois 60015
513-332-2297

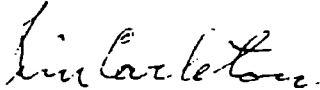
Fax 513-332-2440

DATE: February 1, 1993
TO: Distribution List
SUBJECT: ANNUAL REPORTING REQUIREMENTS UNDER RCRA

The annual Hazardous Waste Report will be due to either the Federal or your State EPA by March 1, 1993 for the period beginning January 1, 1992 and ending December 31, 1992.

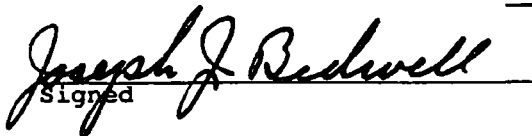
Please submit the report, if required, in a timely manner and advise me by following the instructions below.

If you have any questions concerning the Annual Report, please contact me in Troy.



James J. Carleton

- ☐ Yes. An Annual Report is required and a copy is attached.
- ☒ No. We do not generate sufficient hazardous waste and, therefore, do not need to file an Annual Report.
- ☐ Other. (Explain) _____


Signed

2-4-93
Date

PRO Dayton
Plant

**NOTE: Tax information previously claimed
as CBI per October 2011 correspondence
with Karen Cibulskis of USEPA.**

CERTIFICATE OF AMENDMENT
TO THE
CERTIFICATE OF FORMATION
OF
ITW FOOD EQUIPMENT GROUP LLC

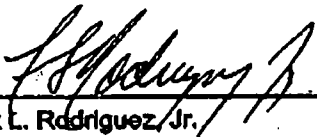
1. The name of the limited liability company is ITW Food Equipment Group LLC
2. The Certificate of Formation of the limited liability company is hereby amended as follows:

Replace paragraph 3 with the following: "The address of its registered office in the State of Delaware is 1209 Orange Street, Wilmington, DE 19801."

Replace paragraph 4 with the following: "The name and address of its registered agent in the State of Delaware is The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801."

3. This Certificate of Amendment to the Certificate of Formation of ITW Food Equipment Group LLC shall be effective on filing.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Amendment of the Certificate of Formation of ITW Food Equipment Group LLC this 21st day of January 2002.



Felix L. Rodriguez, Jr.
Treasurer
Hobart Corporation
Sole member, ITW Food Equipment Group LLC

CERTIFICATE OF FORMATION

OF

HOBART LLC

1. The name of the limited liability company is Hobart LLC.
2. Hobart Corporation, a Delaware corporation, has consented in writing to the formation of Hobart LLC under such name.
3. The address of its registered office in the State of Delaware is 1201 North Market Street, Wilmington, Delaware 19801.
4. The name and address of its registered agent in the State of Delaware are Delaware Corporation Organizers, Inc., 1201 North Market Street, Wilmington, Delaware 19801.
5. This Certificate of Formation shall be effective at 12:01 a.m. on January 1, 2002.

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation of Hobart LLC this 27th day of December, 2001.



Michael J. Perkowski
Authorized Person

**LIMITED LIABILITY COMPANY AGREEMENT
OF
HOBART LLC**

**LIMITED LIABILITY COMPANY AGREEMENT
OF
HOBART LLC**

a Delaware Limited Liability Company

This Limited Liability Company Agreement (the "Agreement") of Hobart LLC, a Delaware limited liability company (the "Company") dated as of January 1, 2002, is executed and agreed to, for good and valuable consideration, by the Members (as defined below). So long as there is only one Member of the Company, the term "Members" shall refer to the sole Member.

**ARTICLE I
DEFINITIONS**

1.1 Definitions. As used in this Agreement, the following terms have the following meanings:

"Act" means the Delaware Limited Liability Company Act, Delaware Code Title 6, Sections 18.101 et seq. and any successor statute, as amended from time to time.

"Affiliate" means, with respect to any Person, any other Person that, directly or indirectly, controls, is under common control with, or is controlled by that Person. For purposes of this definition, "control" (including, with correlative meaning, the terms "under common control with" and "controlled by"), as used with respect to any Person, shall mean the possession, directly or indirectly, of the power to direct and cause the direction of the management and policies of such Person, whether through the ownership of voting securities, by contract or otherwise.

"Agreement" has the meaning given that term in the introductory paragraph.

"Capital Contribution" means, for any Member at the particular time in question, the aggregate of the dollar amounts of any cash contributed to the capital of the Company and the fair market value of any property contributed to the capital of the Company, or, if the context in which such term is used so indicates, the dollar amounts of cash and the fair market value of any property agreed to be contributed, or requested to be contributed, by such Member to the capital of the Company.

"Code" means the Internal Revenue Code of 1986 and any successor statute, as amended from time to time.

"DGCL" means the Delaware General Corporation Law and any successor statute, as amended from time to time.

"Dispose", "Disposing", or "Disposition" means a sale, assignment, transfer, exchange, mortgage, pledge, grant of a security interest, or other disposition or encumbrance (including, without limitation, by operation of law), or the acts thereof.

"General Interest Rate" means a rate per annum equal to the lesser of (a) a varying rate per annum that is equal to the prime interest rate published by *The Wall Street Journal* from time to time as the prime interest rate, with adjustments in that varying rate to be made on the same date as any change in that rate or any other rate as may be determined by the Majority Interest, and (b) the maximum rate permitted by applicable law.

"Majority Interest" shall mean those Members whose aggregate Membership Interests exceed fifty percent (50%).

"Member" means any Person who is designated as a Member on Schedule 1 to this Agreement at the time of reference thereto and who is acting in such Person's capacity as a Member of the Company and any other Persons who, from time to time, become parties to or are otherwise bound by this Agreement as Members.

"Membership Interest" means the percentage interest in the Company held by a Member as set forth opposite such Member's name on Schedule 1 attached hereto at the time of reference thereto.

"Person" has the meaning given that term in the Act.

Other terms defined herein have the meanings so given them.

1.2 **Construction.** Whenever the context requires, the gender of all words used in this Agreement includes the masculine, feminine, and neuter. Except as otherwise specified, all references to Articles and Sections refer to articles and sections of this Agreement, and all references to Schedules and Exhibits are to Schedules and Exhibits attached hereto, each of which is made a part hereof for all purposes.

ARTICLE II ORGANIZATION

2.1 **Formation.** The Company has been organized as a Delaware limited liability company by the filing of a Certificate of Formation (as amended from time to time, the "Certificate") with the Secretary of State of Delaware. The rights and duties of the Members shall be as provided in the Act, except as modified by this Agreement.

2.2 **Name.** The name of the Company is "Hobart LLC" and all Company business must be conducted in that name or such other names that comply with applicable law as the Majority Interest may select from time to time.

2.3 **Registered Office; Principal Office in the United States; Other Offices.** The registered office of the Company shall be 1201 Market Street, in the City of Wilmington (19801), County of New Castle, Delaware. The principal place of business of the Company shall be 701 South Ridge Avenue, Troy, Ohio 45374. The Majority Interest may, from time to time, change the principal place of business of the Company and/or establish additional places of business of the Company.

2.4 Purposes. The purpose of the Company is to carry on any lawful business, purpose or activity for which limited liability companies may be formed in accordance with Section 18-106 of the Act.

2.5 Term. Except as pursuant to Section 10.1, the Company shall have perpetual existence.

2.6 No State-Law Partnership. The Members intend that the Company not be a partnership (including, without limitation, a limited partnership) or joint venture, and that no Member shall be deemed to be a partner or joint venturer of any other Member, for any purposes other than federal and state tax purposes, and this Agreement may not be construed to suggest otherwise.

2.7 Title to Company Property. All property owned by the Company, whether real or personal, tangible or intangible, shall be deemed to be owned by the Company, and no Member, individually, shall have any ownership interest in such property. The Company shall hold all of its property in its own name.

2.8 Foreign Qualifications. Prior to the Company conducting business in any jurisdiction other than the State of Delaware, a Member designated by the Majority Interest may cause the Company to comply, to the extent procedures are available and reasonably within the control of such designated Member, with all requirements necessary to qualify the Company as a foreign limited liability company in such jurisdiction. At the request of such designated Member, each Member shall execute, acknowledge, and deliver all instruments conforming with this Agreement that are necessary or appropriate to qualify, continue, or terminate the Company as a foreign limited liability company in all such jurisdictions in which the Company may conduct business.

ARTICLE III MEMBERSHIP; DISPOSITIONS OF INTERESTS

3.1 Initial Members. The initial Members of the Company are set forth in Schedule 1 hereto, being the Persons executing this Agreement as Members, each of which is deemed to be a Member of the Company as of the date of the filing of the Certificate.

3.2 Representations and Warranties. Each Member hereby represents and warrants to the Company and each other Member that (a) such Member is acquiring its interest in the Company for its own account for investment purposes only, without a view for the distribution or resale thereof and understands that such interests have not been registered under any federal or state securities laws in reliance upon such Member's representations herein; and (b) such Member has been advised that it may not Dispose of its interest without registering such interest under any applicable securities laws or pursuant to an exemption therefrom (such Member acknowledging that neither the Company nor any other Member shall have any obligation to so register such interest) and such Member acknowledges that the interests are not liquid and that such Member must bear the risk of a loss of its investment in the Company for an indefinite period of time.

3.3 Disposition of an Interest. A Member may Dispose of an interest or right, or any part thereof, in or in respect of the Company to any Person; provided, however, that such Disposition is otherwise permissible and does not violate the Securities Act of 1933, as amended, the rules and regulations of the Securities and Exchange Commission, thereunder, or any other applicable state and federal securities laws and regulations.

3.4 Additional Members. Additional Persons may be admitted to the Company as Members and Membership Interests may be created and issued to those Persons and to existing Members at the direction of all Members, on such terms and conditions as the Members may determine at the time of admission.

3.5 Liability to Third Parties. No Member shall be liable for the debts, obligations or liabilities of the Company, including under a judgment decree or order of a court.

3.6 Resignation and Withdrawal. A Member does not have the right or power to resign or withdraw from the Company without the consent of the Majority Interest.

ARTICLE IV CAPITAL CONTRIBUTIONS

4.1 Initial Contributions. Concurrently herewith, the Members shall make the Capital Contributions set forth in Schedule 1 hereto, opposite each such Member's name. Notwithstanding anything to the contrary herein, after the date hereof, no Member shall be required to make any Capital Contribution to the Company or otherwise have any liability to make payments to the Company.

4.2 Return of Contributions. A Member is not entitled to the return of any part of its Capital Contributions or to be paid interest in respect of its Capital Contributions. A Capital Contribution not repaid is not a liability of the Company or of any Member. A Member is not required to contribute or to lend any cash or property to the Company to enable the Company to return any Member's Capital Contributions.

4.3 Advances by Members. If the Company does not have sufficient cash to pay its obligations, any Member(s) that may agree to do so with the approval of the Majority Interest may advance all or part of the needed funds to or on behalf of the Company. An advance described in this Section 4.3 constitutes a loan from the Member to the Company, bears interest at the General Interest Rate from the date of the advance until the date of payment, and is not a Capital Contribution.

ARTICLE V ALLOCATIONS AND DISTRIBUTIONS

5.1 Allocations. Except as may be required by section 704(c) of the Code and Treas. Reg. § 1.704-1(b)(2)(iv)(f)(4), all items of income, gain, loss, deduction, and credit of the Company shall be allocated among the Members in accordance with their Membership Interests.

5.2 Distributions. From time to time, the Majority Interest may determine, in its sole discretion, to what extent (if any) the Company's cash on hand exceeds its current and

anticipated needs, including, without limitation, for operating expenses, debt service, acquisitions, and a reasonable contingency reserve. If such an excess exists, the Majority Interest may, in its sole discretion, cause the Company to distribute to the Members, in accordance with their Membership Interests, an amount in cash equal to that excess.

ARTICLE VI MANAGEMENT

6.1 Management by Members. The Members shall have the right to manage and conduct the business and affairs of the Company and shall have all the powers and rights necessary, appropriate or advisable to effectuate and carry out the purposes and business of the Company. The Members may appoint, employ or otherwise contract with any Persons for the transaction of the business of the Company or the performance of services for or on behalf of the Company, and the Members may delegate to any such Person (who may be designated an officer of the Company) such authority to act on behalf of the Company as the Members may from time to time deem appropriate. Without limitation, the Members may enter into one or more management or service agreements with other Persons and thereby delegate to such management or service providers any of the Members' rights and powers to manage and control the business and affairs of the Company.

6.2 Majority Votes. An affirmative vote or consent by or on behalf of the Majority Interest shall be required to approve or disapprove any matter on which the Members are entitled or required to decide, except as otherwise provided in this Agreement or the Act.

ARTICLE VII INDEMNIFICATION

7.1 Indemnification of Members. To the fullest extent permitted by law, each Member shall indemnify the Company and each other Member and hold them harmless from and against all losses, costs, liabilities, damages, and expenses (including, without limitation, costs of suit and attorney's fees) they may incur on account of any breach by that Member of this Agreement.

7.2 Right to Indemnification. Subject to the limitations and conditions as provided in this Article VII, each Person who was or is made a party or is threatened to be made a party to or is involved in any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative, arbitral or investigative (hereinafter a "Proceeding"), or any appeal in such a Proceeding or any inquiry or investigation that could lead to such a Proceeding, by reason of the fact that he or she, or a Person of whom he or she is the legal representative, is or was a Member of the Company or while a Member of the Company is or was serving at the request of the Company as an officer, partner, venturer, proprietor, trustee, employee, agent, or similar functionary of another foreign or domestic limited liability company, corporation, partnership, joint venture, sole proprietorship, trust, employee benefit plan or other enterprise, shall be indemnified by the Company to the fullest extent permitted by the Act and the DGCL, as the same exist or may hereafter be amended (but, in the case of any such amendment, only to the extent that such amendment permits the Company to provide broader indemnification rights than

said law permitted the Company to provide prior to such amendment) against judgments, penalties (including excise and similar taxes and punitive damages), fines, settlements and reasonable expenses (including, without limitation, attorneys' fees) actually incurred by such Person in connection with such Proceeding, and indemnification under this Article VII shall continue as to a Person who has ceased to serve in the capacity which initially entitled such Person to indemnity hereunder. The rights granted pursuant to this Article VII shall be deemed contract rights, and no amendment, modification or repeal of this Article VII shall have the effect of limiting or denying any such rights with respect to actions taken or Proceedings arising prior to any such amendment, modification or repeal. **IT IS EXPRESSLY ACKNOWLEDGED THAT THE INDEMNIFICATION PROVIDED IN THIS ARTICLE VII COULD INVOLVE INDEMNIFICATION FOR NEGLIGENCE OR UNDER THEORIES OF STRICT LIABILITY.**

7.3 Advance Payment. The right to indemnification conferred in this Article VII shall include the right to be paid or reimbursed by the Company the reasonable expenses incurred by a Person of the type entitled to be indemnified under Section 7.2 who was, is or is threatened to be made a named defendant or respondent in a Proceeding in advance of the final disposition of the Proceeding and without any determination as to the Person's ultimate entitlement to indemnification; provided, however, that the payment of such expenses incurred by any such Person in advance of the final disposition of a Proceeding, shall be made only upon delivery to the Company of a written affirmation by such Member of his or her good faith belief that he or she has met the standard of conduct necessary for indemnification under this Article VII and a written undertaking, by or on behalf of such Person, to repay all amounts so advanced if it shall ultimately be determined that such indemnified Person is not entitled to be indemnified under this Article VII or otherwise.

7.4 Nonexclusivity of Rights. The right to indemnification and the advancement and payment of expenses conferred in this Article VII shall not be exclusive of any other right that a Member or other Person indemnified pursuant to Section 7.2 may have or hereafter acquire under any law (common or statutory), provision of the Certificate, this Agreement, other agreement, vote of disinterested Members, or otherwise.

7.5 Savings Clause. If this Article VII or any portion hereof shall be invalidated on any ground by any court of competent jurisdiction, then the Company shall nevertheless indemnify and hold harmless each Member or any other Person indemnified pursuant to this Article VII as to costs, charges and expenses (including attorneys' fees), judgments, fines and amounts paid in settlement with respect to any action, suit or proceeding, whether civil, criminal, administrative or investigative to the full extent permitted by any applicable portion of this Article VII that shall not have been invalidated and to the fullest extent permitted by applicable law.

ARTICLE VIII TAXES

8.1 Tax Returns. A Person designated by the Majority Interest shall cause to be prepared and filed all necessary federal and state income tax returns for the Company, including making the elections described in Section 8.2. Each Member shall furnish to such Person all

pertinent information in its possession relating to the Company's operations that is necessary to enable the Company's income tax returns to be prepared and filed.

8.2 Tax Elections. The Company shall make such elections on the appropriate tax returns as the Majority Interest may deem appropriate.

8.3 "Tax Matters Member". The Majority Interest shall designate a Member to be the Company's tax matters Member (the "Tax Matters Member") with respect to federal income tax audits. If at any time the Tax Matters Member cannot or elects not to serve as the Tax Matters Member or ceases to be a Member, the Majority Interest shall select another Member to be the Tax Matters Member. The Tax Matters Member, as an authorized representative of the Company, shall direct the defense of any claims made by the IRS to the extent that such claims relate to the adjustment of Company items at the Company level, and all Members agree to cooperate with the Tax Matters Member and not to take any actions that are inconsistent with those taken by the Tax Matters Member. The Company shall reimburse the Tax Matters Member for all costs and expenses reasonably incurred by the Tax Matters Member in such capacity.

ARTICLE IX BOOKS AND RECORDS

9.1 Maintenance of Books. The Company shall keep books and records of accounts and shall keep minutes of the proceedings of its Members. The books of account for the Company shall be maintained on a method approved by the Majority Interest in accordance with the terms of this Agreement. The calendar year shall be the accounting year of the Company.

ARTICLE X DISSOLUTION, LIQUIDATION, AND TERMINATION

10.1 Dissolution. The Company shall dissolve and its affairs shall be wound up on the first to occur of the following:

- (a) the written consent of the Majority Interest;
- (b) entry of a decree of judicial dissolution of the Company under the Act.

10.2 Liquidation and Termination. On dissolution of the Company, the Majority Interest shall appoint one or more Members as liquidator. The liquidator shall proceed diligently to wind up the affairs of the Company and make final distributions as provided herein and in the Act. The costs of liquidation shall be borne as a Company expense. Until final distribution, the liquidator shall continue to operate the Company properties with all of the power and authority of the Members. The steps to be accomplished by the liquidator are as follows:

- (a) as promptly as possible after dissolution and again after final liquidation, the liquidator shall cause a proper accounting to be made by a recognized firm of certified public accountants of the Company's assets, liabilities, and operations through the last day of the calendar month in which the dissolution occurs or the final liquidation is completed, as applicable;

(b) the liquidator shall pay, satisfy or discharge from Company funds all of the debts, liabilities and obligations of the Company (including, without limitation, all expenses incurred in liquidation and any advances described in Section 4.3) or otherwise make adequate provisions for payment and discharge thereof (including, without limitation, the establishment of a cash escrow fund for contingent liabilities in such amount and for such term as the liquidator may reasonably determine); and

(c) all remaining assets of the Company shall be distributed to the Members in accordance with their respective Membership Interests.

All distributions in kind to the Members shall be made subject to the liability of each distributee for costs, expenses, and liabilities theretofore incurred or for which the Company has committed prior to the date of termination and those costs, expenses, and liabilities shall be allocated to the distributee pursuant to this Section 10.2. The distribution of cash and/or property to a Member in accordance with the provisions of this Section 10.2 constitutes a complete return to the Member of its Capital Contributions and a complete distribution to the Member of its Membership Interest and all the Company's property and constitutes a compromise to which all Members have consented within the meaning of the Act. To the extent that a Member returns funds to the Company, it has no claim against any other Member for those funds.

10.3 Articles of Dissolution. On completion of the distribution of Company assets as provided herein, the Company is terminated, and any Member (or such other Person or Persons as the Act may require or permit) shall file Articles of Dissolution with the Secretary of State of Delaware, cancel any other filings made pursuant to Section 2.8, and take such other actions as may be necessary to terminate the Company.

ARTICLE XI GENERAL PROVISIONS

11.1 Offset. Whenever the Company is to pay any sum to any Member, any amounts that Member owes the Company may be deducted from that sum before payment.

11.2 Notices. Except as expressly set forth to the contrary in this Agreement, all notices, requests, or consents provided for or permitted to be given under this Agreement must be in writing and must be given either by depositing that writing in the United States mail, addressed to the recipient, postage paid, and registered or certified with return receipt requested or by delivering that writing to the recipient in person, by courier, or by facsimile transmission; and a notice, request, or consent given under this Agreement is effective on receipt by the Person to receive it. All notices, requests, and consents to be sent to a Member must be sent to or made at the addresses given for that Member on the signature page hereof or such other address as that Member may specify by notice to the other Members. Whenever any notice is required to be given by law, the Certificate or this Agreement, a written waiver thereof, signed by the Person entitled to notice, whether before or after the time stated therein, shall be deemed equivalent to the giving of such notice.

11.3 Entire Agreement. This Agreement constitutes the entire agreement of the Members and their Affiliates relating to the Company and supersedes all prior contracts or agreements with respect to the Company, whether oral or written.

11.4 Effect of Waiver or Consent. A waiver or consent, express or implied, to or of any breach or default by any Person in the performance by that Person of its obligations with respect to the Company is not a consent or waiver to or of any other breach or default in the performance by that Person of the same or any other obligations of that Person with respect to the Company. Failure on the part of a Person to complain of any act of any Person or to declare any Person in default with respect to the Company, irrespective of how long that failure continues, does not constitute a waiver by that Person of its rights with respect to that default until the applicable statute-of-limitations period has run.

11.5 Amendment or Modification. This Agreement may be amended or modified from time to time only by a written instrument and executed and agreed to by the Majority Interest; provided, however, that (i) an amendment or modification reducing a Member's Membership Interest (other than to reflect changes otherwise provided by this Agreement) is effective only with that Member's consent, and (ii) an amendment or modification reducing the required vote for any consent or vote in this Agreement is effective only with the consent or vote of Members having the vote or other measure theretofore required.

11.6 Conflict of Interest; No Implied Duties. To the extent that, at law or in equity, the Majority Interest has duties (including fiduciary duties) and liabilities relating to the Company or any other Member, the Majority Interest shall not be liable to the Company or to any other Member for its good faith reliance on the provisions of this Agreement, which, to the extent that they restrict the duties and liabilities or rights and powers otherwise existing at law or in equity, are agreed by the Members to replace such other duties, liabilities, rights and powers. No Member shall be required to act hereunder as its sole and exclusive business activity and any Member may have other business interests and engage in other activities in addition to those relating to the Company, including those which might compete with the Company. Neither the Company nor any Member shall have any right by virtue of this Agreement in or to any other interests or activities or to the income or proceeds derived therefrom. A Member may transact business with the Company and, subject to applicable laws, has the same rights and obligations with respect thereto as any other Person. No transaction between a Member (or its Affiliates) and the Company shall be voidable solely because a Member has a direct or indirect interest in the transaction.

11.7 Binding Effect. Subject to the restrictions on Dispositions set forth in this Agreement, this Agreement is binding on and inures to the benefit of the Members and their respective heirs, legal representatives, successors, and assigns.

11.8 Governing Law; Severability. THIS AGREEMENT IS GOVERNED BY, AND CONSTRUED AND ENFORCED IN ACCORDANCE WITH THE LAWS OF THE STATE OF DELAWARE, REGARDLESS OF CONFLICT OF LAW PRINCIPLES THEREOF. If any provision of this Agreement or the application thereof to any Person or circumstance is held invalid or unenforceable to any extent, the remainder of this Agreement and the application of that provision to other Persons or circumstances is not affected thereby and that provision shall be enforced to the greatest extent permitted by law.

11.9 Waiver of Certain Rights. Each Member irrevocably waives any right it may have to maintain any action for dissolution of the Company or for partition of the property of the Company.

11.10 Subdivision Titles. Titles appearing at the beginning of the articles, sections, subsections, and other subdivisions of this Agreement are for convenience only and shall not affect the construction of this Agreement.


11.11 Counterparts. This Agreement may be executed in any number of counterparts with the same effect as if all signing parties had signed the same document. All counterparts shall be construed together and constitute the same instrument.

SPACE BELOW INTENTIONALLY BLANK – SIGNATURE PAGE FOLLOWS

IN WITNESS WHEREOF, the Members have executed this Agreement to be effective as of the date set forth above.

MEMBER:

HOBART CORPORATION

By: 
Name: Allan C. Sutherland
Its: Vice President

Address for notices:

**Hobart Corporation
701 South Ridge Avenue
Troy, Ohio 45374**

SCHEDULE 1

MEMBERS

(As of January 1, 2002)

<u>Name/Address</u>	<u>Capital Contribution</u>	<u>Membership Interest</u>
Hobart Corporation 701 South Ridge Avenue Troy, Ohio 45374	A License Agreement relating to certain intangibles and all of the assets of Hobart Corporation, other than the Excluded Assets set forth in <u>Schedule 1(A)</u>	100%
TOTAL		<u>100.00%</u>

SCHEDULE 1(A)

EXCLUDED ASSETS

All assets and liabilities derived from the sales and service of food equipment and/or related spare parts to the casino industry.

All patents and trademarks held by Hobart Corporation as of January 1, 2002.

All stock, securities or ownership interests (including partnership interests, membership interests and joint venture interests) of any other Person.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE
SECURITIES EXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 2001

OR

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF
THE SECURITIES EXCHANGE ACT OF 1934**

For the transition period from _____ to _____

Commission file number 1-4797

ILLINOIS TOOL WORKS INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware
(State or Other Jurisdiction of
Incorporation or Organization)

36-1258310
(I.R.S. Employer
Identification No.)

3600 W. Lake Avenue, Glenview, Illinois
(Address of Principal Executive Offices)

60025-5811
(Zip Code)

Registrant's telephone number, including area code: **(847) 724-7500**

Securities registered pursuant to Section 12(b) of the Act:

Title of Each Class

Name of Each Exchange on Which Registered

Common Stock

New York Stock Exchange
Chicago Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. ☒

The aggregate market value of the voting stock held by non-affiliates of the registrant as of March 12, 2002, was approximately \$18,600,000,000.

Shares of Common Stock outstanding at March 12, 2002 — 305,895,308.

Documents Incorporated by Reference

2001 Annual Report to Stockholders	Parts I, II, IV
Proxy Statement dated March 21, 2002 for Annual Meeting of Stockholders to be held on May 10, 2002	Part III

EXHIBIT 21

**ILLINOIS TOOL WORKS INC.
SUBSIDIARIES AND AFFILIATES
MARCH 2002**

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
1245267 Ontario Limited	Subsidiary	100.00%	Canada
2945-5649 Quebec, Inc.	Subsidiary	100.00%	Canada
A 3 Sud S.r.l	Subsidiary	100.00%	Italy
A.J. Gerrard LLC	Subsidiary	100.00%	Delaware
Accu-Lube Manufacturing GmbH	Affiliate	50.00%	Germany
ACI Kardam Manufacturing Limited	Subsidiary	100.00%	Canada
Acme Flooring Limited	Subsidiary	100.00%	United Kingdom
ALMA Corp. S.A.R.L	Subsidiary	100.00%	France
Alubec Industries, Inc.	Subsidiary	100.00%	Canada
Arborite Inc.	Subsidiary	100.00%	Canada
Arcsmith Canada Inc.	Subsidiary	100.00%	Canada
Ausmark Poland Sp. z.o.o	Subsidiary	100.00%	Poland
AXA Power ApS	Subsidiary	100.00%	Denmark
Axel Akerman A/S	Subsidiary	100.00%	Denmark
Azon Pty. Limited	Subsidiary	100.00%	Australia
B.C. Immo S.C.I	Subsidiary	100.00%	France
B.C.H. S.A.S	Subsidiary	100.00%	France
Bailly Comte S.A.S	Subsidiary	100.00%	France
Balcony Servicos de Consultoria Unipessoal Lda	Subsidiary	100.00%	Madeira
Berkel Products Co. Limited	Subsidiary	100.00%	Canada
Berrington (UK) Ltd.	Subsidiary	100.00%	United Kingdom
BILCME L.L.C	Subsidiary	100.00%	Delaware
Binks Limited	Subsidiary	100.00%	United Kingdom
Bourgeois N.V	Subsidiary	100.00%	Belgium
Bourgeois Tricault International	Affiliate	35.00%	France
Bourgeois Tricault Regethermic Ind. S.A.	Affiliate	35.00%	France
BTRI S.A.	Affiliate	35.00%	France
Burseryds Bruk AB	Subsidiary	100.00%	Sweden
Carbim Duo-Fast do Brazil, Ltda.	Affiliate	50.00%	Brazil
Cema Maschine Fabrik GmbH	Subsidiary	100.00%	Germany
Cetram Pty. Limited	Subsidiary	100.00%	Australia
Champs Investment E.U.R.L	Subsidiary	100.00%	France
Childers Products Co. Ltd.	Subsidiary	100.00%	Canada
Clomarc Investment Corporation Limited	Subsidiary	100.00%	United Kingdom
Cofiva s.r.l	Subsidiary	100.00%	Italy
Comercializadora West Bend S.A. de C.V.	Subsidiary	100.00%	Mexico
COMET S.A.S. (Compagnie de Materiel et d'Equipements Techniques S.A.S.)	Subsidiary	100.00%	France

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Compagnie Hobart S.A.S	Subsidiary	100.00%	France
Corporacion Coral S.A. de C.V.	Subsidiary	100.00%	Mexico
CPM S.A. (Comptoir des Produits Metallurgiques S.A.)	Subsidiary	100.00%	France
CS (Australasia) Limited	Subsidiary	100.00%	Bermuda
CS (Australia) Pty. Ltd.	Subsidiary	100.00%	Australia
CS (Europe) Holdings Ltd.	Subsidiary	100.00%	Bermuda
CS (Finance) Europe S.a.r.l	Subsidiary	100.00%	Luxembourg
CS (Holdings) Europe S.a.r.l	Subsidiary	100.00%	Luxembourg
CS Capital I L.L.C	Subsidiary	100.00%	Delaware
CS Financing I L.L.C	Subsidiary	100.00%	Delaware
CS Leasing GmbH	Subsidiary	100.00%	Germany
CS Packaging (Malaysia) Sdn Bhd	Affiliate	50.00%	Malaysia
CS Packaging Corporation Ltd.	Affiliate	50.00%	British Virgin Island
CS Packaging Corporation Ltd.	Affiliate	50.00%	Hong Kong
CS Packaging Corporation Pte. Ltd.	Affiliate	50.00%	Singapore
CS Packaging Corporation Shanghai Ltd.	Affiliate	50.00%	China
CS Packaging Investment Pte. Ltd.	Affiliate	50.00%	Singapore
CS PMI Holdings Inc.	Subsidiary	100.00%	Delaware
CS PMI Inc.	Subsidiary	100.00%	Delaware
CSE Germany GmbH Co. & KG	Subsidiary	100.00%	Germany
Cumberland Leasing Co.	Subsidiary	100.00%	Illinois
Cyclone Industries Pty. Ltd.	Subsidiary	100.00%	Australia
Cyklop Singapore Pte. Ltd.	Affiliate	50.00%	Singapore
Dacro B.V	Subsidiary	100.00%	Netherlands
D'Arnaud B.V	Subsidiary	100.00%	Netherlands
David Monclus S.A.	Subsidiary	100.00%	Spain
Decorative Sleeves (Ireland) Limited	Subsidiary	100.00%	Ireland
Decorative Sleeves Holdings Limited	Subsidiary	100.00%	United Kingdom
Decorative Sleeves Limited	Subsidiary	100.00%	United Kingdom
Devcon Limited	Subsidiary	100.00%	Ireland
DeVilbiss Equipamentos Para Pintura Industrial Ltda.	Subsidiary	100.00%	Brazil
DeVilbiss Europa Unterstuetzungskasse GmbH	Subsidiary	100.00%	Germany
DeVilbiss Ransburg de Mexico S.A. de C. V	Subsidiary	100.00%	Mexico
Diagraph Corporation Sdn. Bhd	Subsidiary	100.00%	Malaysia
Diagraph Europe Ltd.	Subsidiary	100.00%	United Kingdom
Diagraph Mexico, S.A. de C.V.	Subsidiary	100.00%	Mexico
Dinky Finance Invest S.a.r.l	Subsidiary	100.00%	Luxembourg
Duo-Fast (Singapore) Pte. Ltd.	Affiliate	50.00%	Singapore
Duo-Fast (U.K.) Limited	Subsidiary	100.00%	United Kingdom
Duo-Fast Corporation	Subsidiary	100.00%	Illinois
Duo-Fast CR, s.r.o	Subsidiary	100.00%	Czech Republic
Duo-Fast de Espana S.A.	Subsidiary	100.00%	Spain
Duo-Fast Distribucion Centro, S.A.	Subsidiary	100.00%	Spain
Duo-Fast France S.A.S	Subsidiary	100.00%	France
Duo-Fast GmbH	Subsidiary	100.00%	Germany
Duo-Fast Korea Co. Ltd.	Affiliate	49.00%	Korea
Duo-Fast Polska Sp. Z.o.o	Subsidiary	100.00%	Poland
Edgepack Limited	Subsidiary	100.00%	United Kingdom

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Electrodos de Centroamérica S.A.	Affiliate	50.00%	Guatemala
Elga AB	Subsidiary	100.00%	Sweden
Elga Deutschland Schweisstechnik GmbH	Subsidiary	100.00%	Germany
Elga Saldatura s.r.l	Subsidiary	94.00%	Italy
Elga Skandinavian AS	Subsidiary	100.00%	Norway
Elga Soudage S.A.	Subsidiary	100.00%	France
Elga Welding Consumables Ltd.	Subsidiary	100.00%	United Kingdom
Elga Welding European B.V	Subsidiary	100.00%	Netherlands
Elga-Hitsaus Oy	Subsidiary	100.00%	Finland
Elleyse Financing SNC	Subsidiary	100.00%	France
Eltex-Elektrostatik-GmbH	Subsidiary	100.00%	Germany
Embalajes Agrupados SA	Affiliate	25.00%	Spain
Endra B.V	Subsidiary	100.00%	Netherlands
Envases Multipac, S.A. de C.V.	Affiliate	49.00%	Mexico
Epirez Australia Pty. Ltd.	Subsidiary	100.00%	Australia
Equipment Technique Service S.A.R.L	Subsidiary	100.00%	France
ERG Industrial Corporation Limited	Subsidiary	100.00%	United Kingdom
Etilab GmbH	Subsidiary	100.00%	Germany
Eurotec Refrigerazione S.r.l	Subsidiary	100.00%	Italy
Eurotec s.r.l	Subsidiary	100.00%	Italy
Fastener Imports Limited	Subsidiary	100.00%	Cayman Islands
FEG France Holdings, Inc.	Subsidiary	100.00%	Delaware
Florida Tile Industries, Inc.	Subsidiary	100.00%	Florida
Foster Refrigerator (U.K.) Limited	Subsidiary	100.00%	United Kingdom
Foster Refrigerator France S.A.	Subsidiary	100.00%	France
Foster Refrigerator Holdings GmbH	Subsidiary	100.00%	Germany
Foster Refrigerator Management Services Ltd.	Subsidiary	100.00%	United Kingdom
FTI Factors, Inc.	Subsidiary	100.00%	Delaware
Future Hope — Servicios De Marketing Lda	Subsidiary	100.00%	Madeira
Gaylord Industries (Europe) Limited	Subsidiary	100.00%	United Kingdom
Genious Development S.A.R.L	Subsidiary	100.00%	France
Gerhard Haugk GmbH	Subsidiary	100.00%	Germany
Gerrard Signode Pty. Limited	Subsidiary	100.00%	Australia
H. Bohl GmbH	Subsidiary	100.00%	Germany
H.A. Springer Far East Pte. Ltd.	Subsidiary	100.00%	Singapore
Halles Financing E.U.R.L	Subsidiary	100.00%	France
Haloila Vertrieb GmbH	Subsidiary	100.00%	Germany
Heger GmbH European Diamond Tools	Subsidiary	100.00%	Germany
Heistrap Industriesysteme GmbH	Subsidiary	100.00%	Germany
HFD af 18.December 1997 A/S	Subsidiary	100.00%	Denmark
Hobart (Japan) K.K.	Subsidiary	100.00%	Japan
Hobart Andina S.A.	Subsidiary	100.00%	Columbia
Hobart Argentina S.A.	Subsidiary	100.00%	Argentina
Hobart Brothers (International) AG	Subsidiary	100.00%	Switzerland
Hobart Brothers Company	Subsidiary	100.00%	Ohio
Hobart Brothers International Limitada	Subsidiary	100.00%	Chile
Hobart Corporation	Subsidiary	100.00%	Delaware

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Hobart Dayton Mexicana S.A. de C.V.	Subsidiary	100.00%	Mexico
Hobart do Brasil Ltd.	Subsidiary	100.00%	Brazil
Hobart Equipment Leasing Limited	Subsidiary	100.00%	United Kingdom
Hobart Food Equipment Co. Ltd.	Subsidiary	100.00%	China
Hobart Food Equipment Pty. Ltd.	Subsidiary	100.00%	Australia
Hobart Foster (South Africa) Pty. Ltd.	Subsidiary	100.00%	South Africa
Hobart Foster Belgium B.V.B.A	Subsidiary	100.00%	Belgium
Hobart Foster Holland B.V	Subsidiary	100.00%	Netherlands
Hobart Foster Scandanavia A/S	Subsidiary	100.00%	Denmark
Hobart Foster Techniek B.V	Subsidiary	100.00%	Netherlands
Hobart G.m.b.H	Subsidiary	100.00%	Germany
Hobart Holdings, Inc.	Subsidiary	100.00%	Delaware
Hobart Institute of Welding Technology	Subsidiary	100.00%	Ohio
Hobart International (Singapore) Pte. Ltd.	Subsidiary	100.00%	Singapore
Hobart International (South Asia), Inc.	Subsidiary	100.00%	Delaware
Hobart International, Inc.	Subsidiary	100.00%	Delaware
Hobart Korea Co. Ltd.	Subsidiary	100.00%	Korea
ITW Food Equipment Group LLC	Subsidiary	100.00%	Delaware
Hobart Manufacturing Co. Pty. Ltd.	Subsidiary	100.00%	Australia
Hobart Manufacturing Company Limited, The	Subsidiary	100.00%	United Kingdom
Hobart Sales & Service, Inc.	Subsidiary	100.00%	Ohio
Hopital Services Systemes S.A.S	Subsidiary	100.00%	France
Hylec Eletro Gibi (UK) Ltd.	Affiliate	33.00%	United Kingdom
I.T.W. Inc.	Subsidiary	100.00%	Illinois
ICBIL L.L.C	Subsidiary	100.00%	Delaware
Illinois Tool Works (ITW) Nederland B.V	Subsidiary	100.00%	Netherlands
Illinois Tool Works FSC Inc.	Subsidiary	100.00%	Barbados
IMSA ITW, S.A. de C.V.	Affiliate	50.00%	Mexico
IMSA Paslode, S.A. de C.V.	Affiliate	50.00%	Mexico
IMSA Signode, S.A. de C.V.	Affiliate	50.00%	Mexico
Industrias Regard	Affiliate	10.00%	Spain
Inmobiliaria Cit., S.A. de C.F	Affiliate	49.00%	Mexico
Inox Equipment S.A.	Subsidiary	100.00%	France
Interstrap B.V	Subsidiary	100.00%	Netherlands
Isis SNC	Subsidiary	100.00%	France
ITW (Deutschland) GmbH	Subsidiary	100.00%	Germany
ITW (EU) Holdings Ltd.	Subsidiary	100.00%	Bermuda
ITW Administration GmbH	Subsidiary	100.00%	Germany
ITW AFC Pty. Limited	Subsidiary	100.00%	Australia
ITW Aircraft Investments Inc.	Subsidiary	100.00%	Delaware
ITW Ampang Industries Philippines, Inc.	Subsidiary	100.00%	Philippines
ITW Angleboard AB	Subsidiary	100.00%	Sweden
ITW Asia (Pte.) Limited	Subsidiary	100.00%	Singapore
ITW Australia Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Austria Vertriebs GmbH	Subsidiary	100.00%	Austria
ITW Automotive Italia s.r.l	Subsidiary	100.00%	Italy
ITW Automotive Products GmbH	Subsidiary	100.00%	Germany

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
ITW Automotive Products GmbH & Co. K.G	Subsidiary	100.00%	Germany
ITW Befestigungssysteme GmbH	Subsidiary	100.00%	Germany
ITW Belgium S.p.r.l	Subsidiary	100.00%	Belgium
ITW Bevestigingssystemen B.V	Subsidiary	100.00%	Netherlands
ITW Binks Corporation	Subsidiary	100.00%	Delaware
ITW Brazilian Nominee L.L.C	Subsidiary	100.00%	Delaware
ITW Canada	Subsidiary	100.00%	Canada
ITW Canada Holdings Company	Subsidiary	100.00%	Canada
ITW Canada Management Inc.	Subsidiary	100.00%	Canada
ITW Cayman	Subsidiary	100.00%	Cayman Islands
ITW Chemical Products Ltda	Subsidiary	100.00%	Brazil
ITW Chemical Products Scandinavia ApS	Subsidiary	100.00%	Denmark
ITW Chemische Produkte GmbH	Subsidiary	100.00%	Germany
ITW China Components Inc.	Subsidiary	100.00%	Delaware
ITW Construction Products (Suzhou) Co. Ltd.	Subsidiary	100.00%	China
ITW Construction Products ApS	Subsidiary	100.00%	Denmark
ITW Construction Products B.V	Subsidiary	100.00%	Netherlands
ITW Construction Products Italy s.r.l	Subsidiary	100.00%	Italy
ITW Cupids L.L.C	Subsidiary	100.00%	Delaware
ITW de Argentina S.A.	Subsidiary	100.00%	Argentina
ITW de France S.A.S	Subsidiary	100.00%	France
ITW Decorating Swiss AG	Subsidiary	100.00%	Switzerland
ITW DelFast do Brasil Ltda.	Subsidiary	100.00%	Brazil
ITW Devcon Industriel Products GmbH	Subsidiary	100.00%	Germany
ITW do Brazil Industrial e Comercial Ltda.	Subsidiary	100.00%	Brazil
ITW Domestic Finance Company	Subsidiary	100.00%	Delaware
ITW Domestic Holdings Inc.	Subsidiary	100.00%	Delaware
ITW D-Tech Holdings GmbH	Subsidiary	100.00%	Germany
ITW Dynatec (Hong Kong) Limited	Affiliate	50.00%	Hong Kong
ITW Dynatec G.m.b.H	Subsidiary	100.00%	Germany
ITW Dynatec Kabushiki Kaisha	Subsidiary	100.00%	Japan
ITW Dynatec Singapore Pte. Ltd.	Affiliate	50.00%	Singapore
ITW Dynatec Thailand Ltd.	Affiliate	20.00%	Thailand
ITW Electronic Component Manufacturing Company d.o.o	Subsidiary	100.00%	Slovenia
ITW Electronic Components Packaging Systems, S. de R.L. de C.V.	Subsidiary	100.00%	Mexico
ITW Electronic Components Pte. Ltd.	Subsidiary	100.00%	Singapore
ITW Electronic Packaging (Malta) Ltd.	Subsidiary	100.00%	Malta
ITW Espana S.A.	Subsidiary	100.00%	Spain
ITW Fastex de Argentina S.A.	Subsidiary	100.00%	Argentina
ITW Fastex de Mexico S.A. de C.V.	Subsidiary	100.00%	Mexico
ITW Fastex France S.A.S	Subsidiary	100.00%	France
ITW Fastex Italia s.r.l	Subsidiary	100.00%	Italy
ITW Finance II L.L.C	Subsidiary	100.00%	Delaware
ITW Finance L.L.C	Subsidiary	100.00%	Delaware

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
ITW Finishing L.L.C	Subsidiary	100.00%	Delaware
ITW Foils B.V	Subsidiary	100.00%	Netherlands
ITW Foils Srl	Subsidiary	100.00%	Italy
ITW Gema AG	Subsidiary	100.00%	Switzerland
ITW Gema s.r.l	Subsidiary	100.00%	Italy
ITW Gunther Denmark ApS	Subsidiary	100.00%	Denmark
ITW Gunther GmbH	Subsidiary	100.00%	Germany
ITW Gunther S.A.S	Subsidiary	100.00%	France
ITW Henschel GmbH	Subsidiary	100.00%	Germany
ITW Holding France S.A.S	Subsidiary	100.00%	France
ITW Holdings Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Holdings U.K	Subsidiary	100.00%	United Kingdom
ITW Hospitality Products Pty. Limited	Subsidiary	100.00%	Australia
ITW Industrial Components s.r.l	Subsidiary	100.00%	Italy
ITW Industry Co., Ltd.	Subsidiary	100.00%	Japan
ITW International Finance S.A.S	Subsidiary	100.00%	France
ITW International Holdings Inc.	Subsidiary	100.00%	Delaware
ITW Investments, Inc.	Subsidiary	100.00%	Delaware
ITW Ireland	Subsidiary	100.00%	Ireland
ITW Ireland Holdings	Subsidiary	100.00%	Ireland
ITW Italy Finance E.U.R.L	Subsidiary	100.00%	Italy
ITW Italy Holding S.r.l	Subsidiary	100.00%	Italy
ITW Jeju Industries Private Limited	Subsidiary	55.00%	India
ITW Leasing L.L.C	Subsidiary	100.00%	Delaware
ITW Limited	Subsidiary	100.00%	United Kingdom
ITW Litec S.A.S	Subsidiary	100.00%	France
ITW Ltd. Storbritannien Filal Sverige	Subsidiary	100.00%	Sweden
ITW Meritex (Singapore) Pte. Ltd.	Subsidiary	100.00%	Singapore
ITW Meritex Sdn. Bhd	Subsidiary	100.00%	Malaysia
ITW Mima Films L.L.C	Subsidiary	100.00%	Delaware
ITW Mima Holdings L.L.C	Subsidiary	100.00%	Delaware
ITW Mima Service S.A.S	Subsidiary	100.00%	France
ITW Mima Systems S.A.S	Subsidiary	100.00%	France
ITW Morlock GmbH	Subsidiary	100.00%	Germany
ITW Mortgage Investment I, Inc.	Subsidiary	100.00%	Delaware
ITW Mortgage Investment II, Inc.	Subsidiary	100.00%	Delaware
ITW Mortgage Investment III, Inc.	Subsidiary	100.00%	Delaware
ITW Mortgage Investment IV, Inc.	Subsidiary	100.00%	Delaware
ITW New Zealand Limited	Subsidiary	100.00%	New Zealand
ITW Nominees Ltd.	Subsidiary	100.00%	New Zealand
ITW Oberflaechentechnik GmbH, K.G	Subsidiary	100.00%	Germany
ITW Operations Pty. Ltd.	Subsidiary	100.00%	Australia
ITW P&F Holdings Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Paris E.U.R.L	Subsidiary	100.00%	France
ITW Participations S.a.r.l.	Subsidiary	100.00%	Luxembourg
ITW Philippines Inc.	Subsidiary	100.00%	Philippines
ITW PMI International Investments, Inc.	Subsidiary	100.00%	Delaware
ITW PMI Investments, Inc.	Subsidiary	100.00%	Delaware
ITW Polska Sp. z.o.o	Subsidiary	100.00%	Poland
ITW Poly Mex, S.A. de C.V.	Subsidiary	100.00%	Mexico
ITW Poly Recycling GmbH	Subsidiary	100.00%	Switzerland

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
ITW Polymers & Fluids Group Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Produits Chimiques S.A.S	Subsidiary	100.00%	France
ITW PSL Inc.	Subsidiary	100.00%	Delaware
ITW Residuals III L.L.C	Subsidiary	100.00%	Delaware
ITW Residuals IV L.L.C	Subsidiary	100.00%	Delaware
ITW Richmond Sdn. Bhd	Subsidiary	100.00%	Malaysia
ITW Rivex S.A.	Subsidiary	100.00%	France
ITW Scanimed S.A.S	Subsidiary	100.00%	France
ITW Service Inc.	Subsidiary	100.00%	Korea
ITW Shippers S.p.r.l	Subsidiary	100.00%	Belgium
ITW Signode Australasia Pty. Limited	Subsidiary	100.00%	Australia
ITW Signode Belgium B.V.B.A	Subsidiary	100.00%	Belgium
ITW Signode Holding GmbH	Subsidiary	100.00%	Germany
ITW Signode India Limited	Subsidiary	91.88%	India
ITW SMPI S.A.S	Subsidiary	100.00%	France
ITW South Africa L.L.C	Subsidiary	100.00%	Delaware
ITW SP Europe S.a.r.l	Subsidiary	100.00%	Luxembourg
ITW Specialty Film Co. Ltd.	Subsidiary	100.00%	Korea
ITW Strapping Co. I, S.A. de C.V.	Subsidiary	100.00%	Mexico
ITW Strapping Co. II, S.A. de C.V.	Subsidiary	100.00%	Mexico
ITW Stretch Packaging Systems L.L.C	Subsidiary	100.00%	Delaware
ITW Superannuation Fund 2 Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Superannuation Fund Pty. Ltd.	Subsidiary	100.00%	Australia
ITW Surfaces & Finitions S.A.S	Subsidiary	100.00%	France
ITW Sverige AB	Subsidiary	100.00%	Sweden
ITW Switches Asia Ltd.	Subsidiary	100.00%	Taiwan
ITW Universal L.L.C	Subsidiary	100.00%	Delaware
ITW Welding Products Asia Pacific Pte. Limited	Subsidiary	100.00%	Singapore
ITW Welding Products Group S.A. de C.V.	Subsidiary	100.00%	Mexico
ITW Welding S.A.S	Subsidiary	100.00%	France
ITW-Canguru Rotulos Ltda.	Affiliate	50.00%	Brazil
ITW-Imaden Industria e Comercio Ltda.	Subsidiary	100.00%	Brazil
ITW-Siewer GmbH	Subsidiary	100.00%	Germany
ITW-Siewer Jarmutechnikai Bt	Subsidiary	100.00%	Hungary
ITW-Siewer Vagyonkezelő Kft	Subsidiary	100.00%	Hungary
James Glen Pty. Ltd.	Subsidiary	100.00%	Australia
Japit Inc.	Affiliate	35.80%	Japan
Jemco de Mexico, S.A. de C.V.	Subsidiary	100.00%	Mexico
K & K Welding Products, Inc.	Subsidiary	100.00%	Illinois
Kanto Power Fastening Co., Ltd.	Affiliate	10.74%	Japan
KC Metal Products Pty. Ltd.	Subsidiary	100.00%	Australia
Kema A/S	Subsidiary	100.00%	Denmark
Kinnears Pty. Ltd.	Subsidiary	100.00%	Australia
Kormag Industries e Comercio Ltda.	Affiliate	40.00%	Brazil
Krieger Heissprägefolien GmbH	Subsidiary	100.00%	Germany
Labels & Data Systems (UK) Limited	Subsidiary	100.00%	United Kingdom
Liljendals Bruk AB	Subsidiary	100.00%	Finland
Lombard Pressings Limited	Subsidiary	100.00%	United Kingdom

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Loveshaw Corporation, The	Subsidiary	100.00%	Delaware
LSPS Inc.	Subsidiary	100.00%	Delaware
Lys Comet S.A.S	Subsidiary	100.00%	France
Lys Fusion Poland Sp. z o.o	Subsidiary	100.00%	Poland
M.B. Velle Franche	Affiliate	23.10%	France
Magna Industrial Co. Limited	Subsidiary	100.00%	Hong Kong
Main Investment S.A.R.L	Subsidiary	100.00%	France
Manufacturing Avancee S.A.	Subsidiary	100.00%	Morocco
Maquilas y Componentes Industriales, I S.A. de C.V.	Subsidiary	100.00%	Mexico
Mazel (1980) Limited	Subsidiary	100.00%	United Kingdom
Metales Industrializados, S.A. de C.V.	Affiliate	50.00%	Mexico
Metalflex d.o.o	Subsidiary	100.00%	Slovenia
Miller Electric Mfg. Co.	Subsidiary	100.00%	Wisconsin
Miller Europe s.r.l	Subsidiary	100.00%	Italy
Miller Insurance Ltd.	Subsidiary	100.00%	Bermuda
Mima Films L.L.C	Subsidiary	100.00%	Delaware
Mima Films S.a.r.l	Subsidiary	100.00%	Luxembourg
Mima Films SCA	Subsidiary	100.00%	Belgium
Morgan Polimer Seals, S. de R.L. de C.V.	Subsidiary	75.00%	Mexico
Morgan Polymers Seals, L.L.C	Subsidiary	75.00%	California
Mortgage Ally Inc.	Subsidiary	100.00%	Delaware
Nifco Hi-Cone Leasing Company Limited	Affiliate	40.00%	Japan
Nordic SA	Subsidiary	100.00%	France
Noza Holdings Pty. Ltd.	Subsidiary	100.00%	Australia
Odesign, Inc.	Subsidiary	100.00%	Illinois
Orgapack E.U.R.L	Subsidiary	100.00%	France
Orgapack GmbH	Subsidiary	100.00%	Switzerland
Oy M. Haloila AB	Subsidiary	100.00%	Finland
P.B. Sherman (London) Ltd.	Subsidiary	100.00%	United Kingdom
Packaging Leasing Systems Inc.	Subsidiary	80.00%	Delaware
Pack-Band Hagen GmbH	Subsidiary	65.00%	Germany
PanCon GmbH	Subsidiary	100.00%	Germany
Pennsylvania Pulp & Paper Company (d/b/a International Holographic Paper, Inc.)	Subsidiary	100.00%	Pennsylvania
Permaclad Products Ltd.	Subsidiary	100.00%	Canada
Phillips GSE, Ltd.	Subsidiary	100.00%	United Kingdom
PMI FEG Holland B.V	Subsidiary	100.00%	Netherlands
PMI Food Equipment (Hong Kong) Ltd.	Subsidiary	100.00%	Hong Kong
PMI Food Equipment Group (Malaysia), Inc.	Subsidiary	100.00%	Delaware
PMI Food Equipment Group Europe S.A.	Subsidiary	100.00%	France
PMI Food Equipment Group France S.A.S	Subsidiary	100.00%	France
Polimeros Morgan, S. de R.L. de C.V.	Subsidiary	75.00%	Mexico
Precor Incorporated	Subsidiary	100.00%	Delaware
Precor Products Limited	Subsidiary	100.00%	United Kingdom
Precor Sportgerate G.m.b.H	Subsidiary	100.00%	Germany
Premark Canada Inc.	Subsidiary	100.00%	Canada
Premark Export Sales, Inc.	Subsidiary	100.00%	Barbados

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Premark FEG Beteiligungsgesellschaft m.b.H	Subsidiary	100.00%	Germany
Premark FEG G.m.b.H. & Co. KG	Subsidiary	100.00%	Germany
Premark FEG L.L.C	Subsidiary	100.00%	Delaware
Premark Finance Limited	Subsidiary	100.00%	United Kingdom
Premark FT Holdings, Inc.	Subsidiary	100.00%	Delaware
Premark HII Holdings, Inc.	Subsidiary	100.00%	Ohio
Premark Holdings	Subsidiary	100.00%	United Kingdom
Premark International Holdings B.V	Subsidiary	100.00%	Netherlands
Premark International, Inc.	Subsidiary	100.00%	Delaware
Premark N.V	Subsidiary	100.00%	Netherland Antilles
Premark RWP Holdings, Inc.	Subsidiary	100.00%	Delaware
Premark WB Holdings, Inc.	Subsidiary	100.00%	Delaware
Pronovia Plus s.r.o	Subsidiary	100.00%	Czech Republic
Pronovia s.r.o	Subsidiary	100.00%	Czech Republic
PT Cyklop Indo Utama	Affiliate	28.50%	Indonesia
Quimica TF, S.A. de C.V.	Subsidiary	100.00%	Mexico
R.H. Phillips & Sons (Engineering) Limited	Affiliate	40.00%	United Kingdom
Ramset (Thailand) Ltd.	Affiliate	49.00%	Thailand
Ramset Fasteners (Aust) Pty. Ltd.	Subsidiary	100.00%	Australia
Ramset Fasteners (Hong Kong) Ltd.	Subsidiary	100.00%	Hong Kong
Ramset Fasteners (Malaysia) Sdn. Berhad	Subsidiary	90.00%	Malaysia
Ramset Fasteners (SE Asia) Pte. Ltd.	Subsidiary	100.00%	Singapore
Ramset Fasteners Ltd.	Subsidiary	100.00%	United Kingdom
Ramset Philippines Inc.	Subsidiary	100.00%	Philippines
Ransburg Industrial Finishing K.K	Subsidiary	100.00%	Japan
Ransburg Manufacturing Corporation	Subsidiary	100.00%	Indiana
Resopal G.m.b.H	Subsidiary	100.00%	Germany
Richard Behrend Nachf, GmbH	Subsidiary	100.00%	Germany
Richmond Systempak Limited	Affiliate	49.25%	Hong Kong
Rivex Ltd.	Subsidiary	100.00%	United Kingdom
Rocol Far East Limited	Subsidiary	100.00%	Hong Kong
Rocol France S.A.	Subsidiary	100.00%	France
Rocol Group Limited	Subsidiary	100.00%	United Kingdom
Rocol Korea Limited	Subsidiary	100.00%	Korea
Rocol Limited	Subsidiary	100.00%	United Kingdom
Rocol Site Safety Systems Limited	Subsidiary	100.00%	United Kingdom
RS Industrie S.A.S	Subsidiary	100.00%	France
S.C. Bourgeois	Affiliate	35.00%	France
Sam Jung Signode Inc.	Subsidiary	70.00%	Korea
Sarsfield N.V	Subsidiary	100.00%	Netherland Antilles
Scanilec B.V	Subsidiary	100.00%	Netherlands
SCI des Baquets	Subsidiary	100.00%	France
SCI Rousseau	Subsidiary	100.00%	France
Scybele S.A.S	Subsidiary	100.00%	France
SEINE Investments EURL	Subsidiary	100.00%	France
SEM & BC S.A.S	Subsidiary	100.00%	France
Servicios de Ingenieria Aguascalientes, S. de R.L. de C.V.	Subsidiary	100.00%	Mexico
Servicios de Reynosa, S.A. de C.V.	Subsidiary	100.00%	Mexico
SG Invest Holdings GmbH	Subsidiary	100.00%	Germany

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Shanghai ITW Plastic & Metal Company Limited	Subsidiary	93.00%	China
Sherman Allied Products Limited	Subsidiary	100.00%	United Kingdom
Sherman Treaters (North America) Inc.	Subsidiary	100.00%	Canada
Sherman Treaters Holdings Limited	Subsidiary	100.00%	United Kingdom
Sherman Treaters Limited	Subsidiary	100.00%	United Kingdom
Siddons Ramset Holdings Pty. Limited	Subsidiary	100.00%	Australia
Siewer Automotiv s.r.o	Subsidiary	100.00%	Czech Republic
Signode (Thailand) Limited	Subsidiary	100.00%	Thailand
Signode B.V	Subsidiary	100.00%	Netherlands
Signode Bernpak GmbH	Subsidiary	100.00%	Germany
Signode Brasileria S.A.	Subsidiary	60.00%	Brazil
Signode France S.A.S	Subsidiary	100.00%	France
Signode Ireland Limited	Affiliate	50.00%	United Kingdom
Signode Kabushiki Kaisha	Subsidiary	100.00%	Japan
Signode Manufacturing (Thailand) Limited	Subsidiary	100.00%	Thailand
Signode Packaging Systems Limited	Affiliate	20.00%	East Africa
Signode PGP Limited	Subsidiary	100.00%	United Kingdom
Signode Systems GmbH	Subsidiary	100.00%	Germany
Sima Industri A/S	Subsidiary	100.00%	Denmark
Simco (Nederland) B.V	Subsidiary	100.00%	Netherlands
Simco Japan, K.K	Subsidiary	100.00%	Japan
Societe Nouvelle Chevalier DMYR Equipment	Affiliate	23.10%	France
Solutions Group International Ltd.	Subsidiary	100.00%	Bermuda
Solutions Group Transaction Subsidiary Inc.	Subsidiary	100.00%	Delaware
Speedy Products, Inc.	Subsidiary	100.00%	Minnesota
Spes S.A.S	Subsidiary	100.00%	France
Spiroid Inc.	Subsidiary	100.00%	Delaware
SPIT S.A.S. (Societe de Prospection et d'Inventions Techniques S.A.S.)	Subsidiary	100.00%	France
SPL Group Limited	Subsidiary	100.00%	Australia
SRD Sarl (Societe de Rectification et de Decolletage SARL)	Subsidiary	100.00%	France
Stahl, S.A. de C.V.	Affiliate	50.00%	Mexico
Strapex (Canada) Corporation	Subsidiary	100.00%	Nova Scotia
Strapex ApS	Subsidiary	100.00%	Denmark
Strapex Embalagem L.d.a	Subsidiary	100.00%	Portugal
Strapex GmbH	Subsidiary	100.00%	Switzerland
Strapex GmbH	Subsidiary	100.00%	Germany
Strapex GmbH	Subsidiary	100.00%	Austria
Strapex Holding GmbH	Subsidiary	100.00%	Switzerland
Strapex Nederland B.V	Subsidiary	100.00%	Netherlands
Strapex S.A.S	Subsidiary	100.00%	France
Strapex S.p.r.l	Subsidiary	100.00%	Belgium
Strapex s.r.l	Subsidiary	100.00%	Italy
Strapex UK Limited	Subsidiary	100.00%	United Kingdom
Surfmill Ltd.	Subsidiary	100.00%	United Kingdom
Synertech GmbH	Subsidiary	100.00%	Germany
Tamanaco Holding B.V	Subsidiary	100.00%	Netherlands
Ten Plus GmbH	Subsidiary	100.00%	Germany
Ten Plus S.A.S	Subsidiary	100.00%	France

COMPANY	RELATIONSHIP	PERCENT OWNERSHIP	JURISDICTION
Texwipe Philippines, Inc.	Subsidiary	100.00%	Philippines
Texwipe Singapore Pte. Ltd.	Subsidiary	100.00%	Singapore
Thermal Media Transfer Limited	Subsidiary	100.00%	United Kingdom
Thimaix S.A.S	Subsidiary	100.00%	France
Tien Tai Eletrode Co., Ltd.	Affiliate	40.00%	Taiwan
Toolmatic B.V	Subsidiary	100.00%	Netherlands
Toolmatic B.V.B.A	Subsidiary	100.00%	Belgium
Transoliw Ltd.	Subsidiary	100.00%	United Kingdom
Trilectron Europe, Limited	Subsidiary	100.00%	United Kingdom
Triumph Financing E.U.R.L	Subsidiary	100.00%	France
Unipac Corporation	Subsidiary	100.00%	Canada
Unipac Limited	Subsidiary	100.00%	United Kingdom
Unipac, Inc.	Subsidiary	100.00%	Delaware
Val' Outillage S.A.S	Subsidiary	100.00%	France
Valeron Holdings, Inc.	Subsidiary	100.00%	Delaware
Valeron Inc.	Subsidiary	100.00%	Delaware
Valeron Strength Films L.P.	Subsidiary	100.00%	Texas
Valeron Strength Films N.V	Subsidiary	100.00%	Belgium
Valeron Strength Films UK Limited	Subsidiary	100.00%	United Kingdom
Veneta Decalcogomme s.r.l	Subsidiary	100.00%	Italy
Victor Ridder GmbH & Co. KG	Subsidiary	100.00%	Germany
Wavebest Limited	Subsidiary	100.00%	United Kingdom
Welding Industries Ltd.	Subsidiary	100.00%	Australia
West Bend Company, The	Subsidiary	100.00%	Delaware
West Bend de Mexico S.A. de C.V.	Subsidiary	100.00%	Mexico
Wilsonart (Shanghai) Co. Ltd.	Subsidiary	100.00%	China
Wilsonart (Thailand) Co. Ltd.	Subsidiary	75.00%	Thailand
Wilsonart Holdings Limited	Subsidiary	100.00%	United Kingdom
Wilsonart Hong Kong Ltd.	Subsidiary	100.00%	Hong Kong
Wilsonart International Holdings, Inc.	Subsidiary	100.00%	Delaware
Wilsonart International, Inc.	Subsidiary	100.00%	Delaware
Wilsonart Korea Ltd.	Subsidiary	100.00%	Korea
Wilsonart Ltd.	Subsidiary	100.00%	United Kingdom
Wilsonart Singapore Pte. Ltd.	Subsidiary	100.00%	Singapore
Wilsonart South Africa (Pty.) Ltd.	Subsidiary	100.00%	South Africa
Wilsonart Taiwan Corp. Ltd.	Subsidiary	100.00%	Taiwan
Wolf Catering Equipment (U.K.) Ltd.	Subsidiary	100.00%	United Kingdom

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

(Mark One)

☒ ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE
SECURITIES EXCHANGE ACT OF 1934

For the fiscal year ended December 31, 2000

OR

☐ TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF
THE SECURITIES EXCHANGE ACT OF 1934

For the transition period from _____ to _____

Commission file number 1-4797

ILLINOIS TOOL WORKS INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware
(State or Other Jurisdiction of
Incorporation or Organization)

36-1258310
(I.R.S. Employer
Identification No.)

3600 W. Lake Avenue, Glenview, Illinois
(Address of Principal Executive Offices)

60025-5811
(Zip Code)

Registrant's telephone number, including area code: (847) 724-7500

Securities registered pursuant to Section 12(b) of the Act:

<u>Title of Each Class</u>	<u>Name of Each Exchange on Which Registered</u>
Common Stock	New York Stock Exchange Chicago Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. ☒

The aggregate market value of the voting stock held by non-affiliates of the registrant as of January 31, 2001, was approximately \$15,100,000,000.

Shares of Common Stock outstanding at January 31, 2001 — 303,001,668.

Documents Incorporated by Reference

2000 Annual Report to Stockholders Parts I, II, IV
Proxy Statement dated March 21, 2001, for Annual Meeting of Stockholders
to be held on May 11, 2001 Part III

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

(Mark One)

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 1999

OR

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934**

For the transition period from _____ to _____

Commission file number 1-4797

ILLINOIS TOOL WORKS INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware

(State or Other Jurisdiction of
Incorporation or Organization)

36-1258310

(I.R.S. Employer
Identification No.)

3600 W. Lake Avenue, Glenview, Illinois

(Address of Principal Executive Offices)

60025-5811

(Zip Code)

Registrant's telephone number, including area code: **(847) 724-7500**

Securities registered pursuant to Section 12(b) of the Act:

Title of Each Class

Name of Each Exchange on Which Registered

Common Stock

New York Stock Exchange
Chicago Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Yes ☒ No ☐

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The aggregate market value of the voting stock held by non-affiliates of the registrant as of March 14, 2000, was approximately \$12,400,000,000.

Shares of Common Stock outstanding at March 14, 2000 — 300,678,897.

Documents Incorporated by Reference

1999 Annual Report to Stockholders Parts I, II, IV
Proxy Statement dated March 27, 2000, for Annual Meeting of Stockholders
to be held on May 12, 2000 Part III

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

(Mark One)

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE
SECURITIES EXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 1998

OR

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF
THE SECURITIES EXCHANGE ACT OF 1934**

For the transition period from _____ to _____

Commission file number 1-4797

ILLINOIS TOOL WORKS INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware
(State or Other Jurisdiction of
Incorporation or Organization)

36-1258310
(I.R.S. Employer
Identification No.)

3600 W. Lake Avenue, Glenview, Illinois
(Address of Principal Executive Offices)

60025-5811
(Zip Code)

Registrant's telephone number, including area code: (847) 724-7500

Securities registered pursuant to Section 12(b) of the Act:

<u>Title of Each Class</u>	<u>Name of Each Exchange on Which Registered</u>
Common Stock	New York Stock Exchange Chicago Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. ☐

The aggregate market value of the voting stock held by non-affiliates of the registrant as of March 16, 1999, was approximately \$12,700,000,000.

Shares of Common Stock outstanding at March 16, 1999 — 250,307,289.

Documents Incorporated by Reference

1998 Annual Report to Stockholders Parts I, II, IV
Proxy Statement dated March 25, 1999, for Annual Meeting of Stockholders
to be held on May 14, 1999 Part III

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

FORM 10-K

(Mark One)

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF
THE SECURITIES EXCHANGE ACT OF 1934**

For the fiscal year ended December 31, 1997

OR

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF
THE SECURITIES EXCHANGE ACT OF 1934**

For the transition period from _____ to _____

Commission file number 1-4797

ILLINOIS TOOL WORKS INC.

(Exact Name of Registrant as Specified in its Charter)

Delaware
(State or Other Jurisdiction of
Incorporation or Organization)

36-1258310
(I.R.S. Employer
Identification No.)

3600 W. Lake Avenue, Glenview, Illinois
(Address of Principal Executive Offices)

60025-5811
(Zip Code)

Registrant's telephone number, including area code: **(847) 724-7500**

Securities registered pursuant to Section 12(b) of the Act:

Title of Each Class

Name of Each Exchange on Which Registered

Common Stock

New York Stock Exchange
Chicago Stock Exchange

Securities registered pursuant to Section 12(g) of the Act: None

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days.

Yes ☒ No ☐

Indicate by check mark if disclosure of delinquent filers pursuant to Item 405 of Regulation S-K is not contained herein, and will not be contained, to the best of registrant's knowledge, in definitive proxy or information statements incorporated by reference in Part III of this Form 10-K or any amendment to this Form 10-K. ☐

The aggregate market value of the voting stock held by non-affiliates of the registrant as of March 10, 1998, was approximately \$11,300,000,000.

Shares of Common Stock outstanding at March 10, 1998 — 249,760,628.

Documents Incorporated by Reference

1997 Annual Report to Stockholders Parts I, II, IV
Proxy Statement dated March 26, 1998 for Annual Meeting of Stockholders
to be held on May 8, 1998 Part III



News Release

ITW Reports a 3 Percent Decrease in Diluted Income Per Share from Continuing Operations in 2002 First Quarter; Revenues Decline 4 percent During the Period

GLENVIEW, ILLINOIS—(April 17, 2002)—Illinois Tool Works Inc. (NYSE:ITW) today reported that 2002 first quarter income per share from continuing operations excluding goodwill amortization declined 3 percent compared to the prior year period. During the 2002 first quarter, operating revenues decreased 4 percent. On a comparable basis excluding goodwill amortization, income from continuing operations in the 2002 first quarter was \$194.4 million, or 63 cents per share, versus \$199.0 million, or 65 cents per share in the 2001 first quarter.

The modest decline in first quarter income from continuing operations occurred against a backdrop of mildly improving North American end markets, softening International end markets and continuing restructuring for a number of ITW businesses. For the 2002 first quarter, operating revenues were \$2.205 billion compared with \$2.296 billion for the year earlier period.

A required change in accounting resulted in a non-cash charge to earnings in first quarter 2002 of \$221.9 million, or 72 cents per share on a fully diluted basis. This charge is the cumulative impact of evaluating goodwill for impairment based on the new fair value method as required by Statement of Financial Accounting Standards 142. This amount represents 10 percent of the Company's goodwill and other intangibles. As a result of this required accounting change, the Company recorded a net loss of \$23.4 million or minus 8 cents per share for the first quarter.

The Company's cash generation from operations continued to be strong in the most recent quarter and reflected reduced working capital and capital expenditures as a result of the mixed economy. For the first quarter, free operating cash flow was approximately \$263 million on income from continuing operations of \$194 million.

"We believe the first quarter may prove to be meaningful because it represented modest improvement in some of our North American end markets," said W. James Farrell, chairman and chief executive officer. "Base business revenues moved from minus 9 percent in the fourth quarter of last year to minus 6 percent for the just concluded first quarter. Our ability to improve margins 40 basis points was directly tied to reducing our SG&A costs 5 percent for the quarter."

Segment highlights include:

North American Engineered Products revenues declined 1 percent mainly due to weakness in the industrial plastics and metals, construction, electronics and electronic component packaging businesses. Operating income grew 14 percent principally as a result of strength in businesses associated with the automotive and construction end markets. As a result, operating margins were up 220 basis points.

International Engineered Products revenues and operating income decreased 8 percent and 26 percent, respectively, mainly due to weakness in base businesses serving the

automotive and general industrial sectors as well as the impact of an asset writedown and currency translation. Operating margins declined 200 basis points.

North American Specialty Systems revenues declined 2 percent as base business decreases in the industrial packaging, food equipment and finishing units offset positive contributions from the welding businesses. Operating income grew 2 percent as positive contributions from the food equipment, welding and industrial packaging businesses offset restructuring charges for various businesses. Operating margins were up 50 basis points.

International Specialty Systems revenues and operating income declined 9 percent and 20 percent, respectively, largely due to weakness in the industrial packaging and finishing businesses as well as the impact of currency translation. Operating margins declined 110 basis points.

Leasing and Investments operating income was down 26 percent due to gains on sales of investment properties that were realized in the first quarter of 2001.

Looking ahead, the Company expects some sequential improvement in end markets and associated base business for the 2002 second quarter. As a result, the Company projects second quarter 2002 diluted earnings per share for continuing operations to be in the range of 77 cents to 87 cents. For full-year 2002, the Company is forecasting diluted earnings per share for continuing operations to be in the range of \$2.95 to \$3.25 based on expected improving economic trends in the second half of the year.

This First Quarter 2002 Earnings Release contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995 including, without limitation, statements regarding end market conditions in the second quarter and second half of 2002 and the Company's related earnings forecasts. These statements are subject to certain risks, uncertainties, and other factors, which could cause actual results to differ materially from those anticipated. Important factors that could cause actual results to differ materially from the Company's expectations are set forth on page four of ITW's Form 10-K for 2001.

ITW is a \$9.3 billion diversified manufacturer of highly engineered components and industrial systems and consumables. The Company consists of approximately 600 decentralized operations in 43 countries and employs some 52,000 people.

CONTACT: John Brooklier, 847-657-4104

ILLINOIS TOOL WORKS INC.
(In thousands except per share data)

	THREE MONTHS ENDED	
	MARCH 31	
STATEMENT OF INCOME	2002	2001
Operating Revenues	\$ 2,204,654	\$ 2,295,840
Cost of revenues	1,475,119	1,537,365
Selling, administrative, and R&D expenses	414,764	438,290
Amortization of goodwill and other intangibles	4,872	23,912
Operating Income	309,899	296,273
Interest expense	(17,503)	(18,189)
Other income	2,076	2,293
Income From Continuing Operations Before Income Taxes	294,472	280,377
Income taxes	100,100	97,976
Income From Continuing Operations	194,372	182,401
Income From Discontinued Operations	4,075	357
Cumulative Effect of Change in Accounting Principle	(221,890)	0
Net Income (Loss)	\$ (23,443)	\$ 182,758
Income Per Share from Continuing Operations:		
Basic	\$ 0.64	\$ 0.60
Diluted	\$ 0.63	\$ 0.60
Income Per Share from Discontinued Operations:		
Basic	\$ 0.01	\$ 0.00
Diluted	\$ 0.01	\$ 0.00
Cumulative Effect Per Share of Change in Accounting Principle:		
Basic	\$ (0.73)	\$ 0.00
Diluted	\$ (0.72)	\$ 0.00
Net Income (Loss) Per Share :		
Basic	\$ (0.08)	\$ 0.60
Diluted	\$ (0.08)	\$ 0.60
Pro Forma Excluding Goodwill Amortization:		
Income from Continuing Operations	\$ 194,372	\$ 198,960
Income per diluted share from Continuing Operations	\$ 0.63	\$ 0.65
Shares outstanding during the period :		
Average	305,532	303,151
Average assuming dilution	307,985	305,731

ILLINOIS TOOL WORKS INC.
(In thousands)

STATEMENT OF FINANCIAL POSITION

ASSETS

	MAR 31, 2002	DEC 31, 2001
Cash & equivalents	\$ 281,026	\$ 282,224
Trade receivables	1,486,807	1,450,029
Inventories	964,958	994,156
Deferred income taxes	195,269	197,428
Prepays and other current assets	133,419	139,226
Net current assets of discontinued operations	95,754	100,181
Total current assets	<u>3,157,233</u>	<u>3,163,244</u>
Plant & equipment	4,108,505	4,103,960
Less: accumulated depreciation	<u>(2,503,325)</u>	<u>(2,470,270)</u>
Net plant & equipment	<u>1,605,180</u>	<u>1,633,690</u>
Investments	1,379,207	1,278,285
Goodwill	2,281,592	2,516,813
Intangible assets	208,835	221,881
Deferred income taxes	492,785	439,278
Other assets	450,070	459,429
Net noncurrent assets of discontinued operations	107,844	109,729
	<u>\$ 9,682,746</u>	<u>\$ 9,822,349</u>

LIABILITIES and STOCKHOLDERS' EQUITY

Short-term debt	\$ 276,498	\$ 313,447
Accounts payable	390,864	367,249
Accrued expenses	765,004	795,210
Cash dividends payable	67,352	67,084
Income taxes payable	56,305	32,922
Total current liabilities	<u>1,556,023</u>	<u>1,575,912</u>
Long-term debt	1,249,744	1,267,141
Other liabilities	931,043	938,558
Total non-current liabilities	<u>2,180,787</u>	<u>2,205,699</u>
Common stock	3,063	3,052
Additional paid-in capital	706,926	675,856
Income reinvested in the business	5,674,625	5,765,421
Common stock held in treasury	(1,662)	(1,666)
Cumulative translation adjustment	<u>(437,016)</u>	<u>(401,925)</u>
Total stockholders' equity	<u>5,945,936</u>	<u>6,040,738</u>
	<u>\$ 9,682,746</u>	<u>\$ 9,822,349</u>

ITW Food Equipment Group

Safety & Environmental Department

Steve Adams, Manager Safety & Environmental
ITW Food Equipment Group
701 S. Ridge Avenue
Troy, Ohio 45374

Phone: 937-332-2716
Fax: 937-332-2520
E-mail: Steve.Adams@itwfeg.com

October 14, 2002

Re: South Dayton Landfill Issues

Ken,

As you requested, I have been researching available documents and attempting to find contact persons with knowledge of the waste activities at the two Hobart locations in Dayton, Ohio named in the 104 (e) request.

While conducting the research I found that a person by the name of Les Rosell (Mgr. Facilities Engineering) had the most information regarding waste streams and disposal. Unfortunately Les is deceased. The next person in line would have been the maintenance manger (Fred McIntosh) he too is deceased. During the time frame in question the plant manager was Mark Wright, he is also deceased.

The following is a list of those persons that I have contacted by phone and their response:

Joseph Bedwell – Responsible for safety at both locations. Joe is currently a security guard at the Dayton Art Institute. I spoke with him today and he advised that he had some records on the amount of solid waste from the facility, but when he left the company in 1995 the records went to Mel Swiger. Joe did state that he remembered that a company named Koogler-Suburban picked up the majority of solid waste.

Mel Swiger – Mel was the last plant manger at the Huffman Street facility before it closed in 1995. Mel left the company in 1998 under difficult terms. Numerous calls have been made to his home phone number but no response. Messages have been left on his answering machine.

Harley Cyphers – This man worked for the company from 1977-1997. He held several positions but when speaking with him on the phone he did not remember any trash or waste disposal procedures nor vendor that were used.


Steve Pettit – Steve is still employed by Hobart. He served as an inventory control specialist at these locations. He only remembers that Les Rosell & Fred McIntosh handled disposal issues.

Bill Anthony – Bill is still employed by Hobart. His position was that of Mgr. Inventory Control. He could not provide any information on waste practices at either facility.

The incriminating evidence is the letter Jim Carleton provided to Ohio EPA in 1984. In this letter Jim states that a Joe Sepeck took waste from the Hobart facilities to two landfills in Dayton: Blelock Landfill and S. Dayton Landfill. A file document shows that in 1976, two shipments (550 gal. & 770 gal.) were removed by Mr. Sepeck. This total amount of 1320 gallons is the amount not accounted for and presumably our link to the site.

At this point I have run out of people to contact. One more option available is to check old accounts payable records from that time frame to see if we can obtain information regarding vendor names, dates, quantities of materials shipped or other useful information. I'll contact that department tomorrow and see if we have any luck, but going back to the late '70s may be an impossible task.

Attached are several documents I pulled from Records Retention for the two sites. The info provides some background information and it may be useful for you to become familiar with the sites. I'll keep in contact and if any new information develops you'll be the first to know.

A handwritten signature in black ink, appearing to read "Jim Carleton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.



APR 11 1984

WORLD HEADQUARTERS TROY, OHIO 45774 513 226 7171

April 10, 1984

RECEIVED

APR 16 1984

Environmental Protection Agency
SOUTHWEST DISTRICT

Ohio EPA
Patrick H. Gorman
Southeast District Office
2195 Front Street
Logan, OH 43138

Dear Mr. Gorman:

I am responding to your request for information concerning the past waste disposal practices of the Dayton Plants of Hobart Corporation.

Hobart has two plant facilities in Dayton which are within 2 blocks of each other.

1. 216 South Torrence Street
2. 446 Huffman Avenue

The Torrence Street Plant was and still is an assembly facility. In July of 1982 the Huffman Avenue Plant ceased manufacturing operations and the facility was converted to a parts distribution center. The Torrence Street Plant has always had extremely small amounts of liquid materials for disposal. In 1981 (refer to Exhibit I) Len Rosell responded to Don Marshall of OEPA concerning the Industrial Waste Survey. The quantity of liquid waste from Torrence amounted to 110 gallons/year of waste 1,1,1 - trichloroethane. This type of waste and quantity would have been expected from Torrence during the time period in question, namely 1973 thru 1980. Because of the small quantity of waste generated by Torrence, the Huffman Plant would combine the Torrence waste with its own waste for disposal. As can be seen in Exhibit 1, the major portion of the waste was from Huffman.

The wastes generated during the 1973-1980 time frame consisted of the following materials:

1. 1,1,1 - Trichloroethane and cutting oil from degreasing.
2. Combination of methyl ethyl ketone, xylene, and paint.
3. Stoddard solvent and cutting oil from degreasing.
4. Machine tool water based synthetic coolants contaminated with cutting oils and solvents.

All four items were combined in single drums between 1973 and 1976. In 1976 Joe Spector informed Hobart that he no longer was in the business to haul our type of waste and, therefore, we should find another means of disposal. At that time, we began to separate the wastes as outlined above into single drums.

EQUIPMENT, CONSUMABLES AND SERVICES FOR THE WORLD'S FOOD INDUSTRY... KITCHENAID APPLIANCES FOR THE HOME... IN OVER 100 COUNTRIES

Patrick H. Cornan
April 10, 1984
Page 2

I contacted Les Rosell, who is now a former Hobart employee, requesting any additional data that he might be able to remember concerning waste disposal prior to RCRA. The letter that Mr. Rosell generated on June 1, 1981 (Exhibit 11) for our subsequent CERCLA 103(c) response contained information he obtained from Emory Joseph Sepeck and from his own files. The exact dates of June 4, 1973 thru July 5, 1976 came directly from Joe Sepeck according to Les Rosell.

I called Mr. Sepeck on March 21, 1984 to confirm the information contained in Les Rosell's letter of June 1, 1981. Joe Sepeck told me that he did not take any of Hobart's waste to Marietta but rather to the Biglock Landfill on Dorothy Lane in Dayton and the South Dayton Landfill in Dayton. He said he had no reason to take our waste out of the Dayton area during the time period in question. A subsequent call to Mr. Rosell could neither confirm nor deny Joe Sepeck's statement of where the material had been disposed.

We then commenced a search of our records based on suggestions made by Les Rosell concerning possible disposal sources that he had used after July 5, 1976. Mr. Rosell indicated that he had to separate his waste into the four categories described earlier in order to satisfy the disposal companies. We contacted the five disposal companies provided by Mr. Rosell for documentation of handling waste from 448 Huffman. Those five companies are: Clark Oil Company, Environmental Processing Services, Solvent Resource Recovery, Syntech Liquid Treatment Corporation and TriOil Environmental Services, Inc. Pursuant to your suggestion Pat, we also checked on the name "Combined Systems Waste Disposal Company" which Joe Sepeck became involved with in 1978. We could not find any invoices from that vendor.

I believe we have accounted for all of our liquid waste disposed of between 1976 and 1981. Exhibit III, Waste Vendors and Amounts, details each waste shipment per disposal facility as detailed by information submitted by the vendor or obtained from Hobart records. Exhibit IV, Summary of Wastes from 3-17-76 thru 10-19-81, accounts for the liquid waste that would seem reasonable for the plant to have generated.

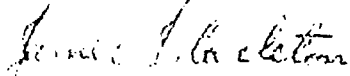
Exhibit V represents analysis of our paint sludge and the waste water-based coolant. This data would be typical of the waste generated between 1973 and 1981.

In closing, I believe that the information concerning disposal of liquid waste in Marietta, Ohio was erroneous as stated in the letter from L.P. Rosell dated June 1, 1981. Furthermore, we have no apparent evidence indicating that any of Hobart's waste was ever taken to Marietta.

Patrick H. Gorman
April 10, 1984
Page 3

Please evaluate this information and if I can be of any further assistance,
please contact me in Troy, Ohio at (513) 335-7171, extension 2751.

Sincerely,



James J. Carleton, Manager
Corporate Safety & Environmental
Protection

:RMA

Attachment:

cc: Jack A. VauKley, Assistant Attorney General of the State of Ohio
Don Marshall, OEPA

EXHIBIT I



WORLD HEADQUARTERS TROY OHIO 45374

PLEASE REPLY TO

P.O. BOX 1690
DAYTON, OHIO 45401

April 13, 1981

Ohio EPA
Southwest District Office
7 East Fourth Street
Dayton, Ohio 45402

Attention: Mr. Donald S. Marshall
Environmental Specialist

Dear Sir:

Enclosed are the survey forms that you requested pertaining to waste generated at Hobart's two plants. These are correct and complete to the best of my knowledge.

Please let me know if you require further information.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "L. P. Rosell".

L. P. Rosell
Mgr., Facilities Engineering

mkm

Handwritten note:
COPY SENT
TO: JIM CRISTIAN

1901 INDUSTRIAL WASTE SURVEY

A. Company Information

1. Company Name:

Robart Corporation

2. Company Address:

448 Huffman Avenue, Dayton, Ohio 45403

3. County in which company located:

Montgomery

4. Name of person responding to survey:

L. P. Rosell

Telephone:

254-8451

B. Description of wastes currently produced:

<u>Waste name</u>	<u>quantity generated</u>	<u>solid, sludge</u> <u>liquid, hazardous</u>	<u>on-or</u> <u>off-site</u> <u>disposal</u>	<u>method (pit,</u> <u>incinerator,</u> <u>landfill, etc.)</u>
Trash	32 Cu. Yd./Wk.	Solid	Off	Landfill
Solvent-oil	55 Gal./Mo.	Liquid	Off	Reclaim
Solvent-paint	30 Gal./Mo.	Liquid-Hazardous	Off	Reclaim
Chlorothene VG	30 Gal./Mo.	Liquid	Off	Reclaim

C. Off-site: Give haulers' name and address, and site of ultimate disposal, for each of the above listed wastes.

Keogler-Suburban, 4080 Industrial Lane, Dayton, Ohio 45430	Landfill
Clark Oil Co., 300 S. West End Avenue, Dayton, Ohio 45427	Reclaim
Solvent Resources Recovery, P.O. Box 453, West Carrollton, Ohio 45449	Reclaim
" " " " " " " " " "	"

D. Closed sites: Give waste descriptions and approximate quantities for any wastes previously disposed in a now closed or inactive on-site facility. Give dates site used and closed.

NONE

E. If you were unable to answer any above questions because the information is considered confidential by your company, indicate this here and we will contact you personally.

A. Company Information

1. Company Name:

Hubert Corporation

2. Company Address:

216 S. Torrence Street, Dayton, Ohio 45403

3. County in which company located:

4. Name of person responding to survey:

Montgomery

L. P. Rosell

Telephone:

234-8451

B. Description of wastes currently produced:

<u>Waste name</u>	<u>quantity generated</u>	<u>solid, sludge</u> <u>liquid, hazardous</u>	<u>on-on</u> <u>off-site</u> <u>disposal</u>	<u>method (pit,</u> <u>incinerator,</u> <u>landfill, etc.)</u>
Trash	8 Cu. Yd./Day	Solid	Off	Landfill
Chloroethene V.O.	110 Gal./Yr.	Sludge	Off	Reclaim

C. Off-site: Give haulers name and address, and site of ultimate disposal, for each of the above listed wastes.

N&N Commercial Waste, P.O. Box 202, Forest Park Station, Dayton, Ohio 45403
Landfill

Solvent Resource Recovery, Inc., P.O. Box 453, West Carrollton, Ohio 45446
Reclaim

D. Closed sites: Give waste descriptions and approximate quantities for any wastes previously disposed in a now closed or inactive on-site facility. Give dates site used and closed.

NONE

E. If you were unable to answer any above questions because the information is considered confidential by your company, indicate this here and we will contact you personally.

EXHIBIT II



WORLD HEADQUARTERS

DAYTON, OHIO 45424

PLEASE REPLY TO

P.O. BOX 1690
DAYTON, OHIO 45401

June 1, 1981

To: J. J. Carleton
From: L. P. Rosell
Subject: Superfund Notification

In reply to your memo of May 13, 1981, the EPA identification number for Torrence Street is D004237434. We have not received a number for Huffman Avenue.

The major portion of our waste, in the past, has been F002, 1,1,1 Chloroethane, and F003 Paint Thinner.

Our past records of disposal are quite sketchy, but we do show between June 4, 1973, and July 5, 1976, having averaged about 15 drums of liquid waste per month. These were hauled away by Emery Jos. Sopceck of 4330 Springfield Pk., Dayton, Ohio. They were disposed of at a private (then) turned public landfill in Marietta, Ohio. The vast majority of this waste was water in the form of machine coolant.

Since that time, Systems Technology of Xenia, Ohio, has picked up and reclaimed our waste. More recently Clark Oil Co. of Dayton has picked it up and reclaimed it.

A recent check of quantities indicates that we generate about 1 drum per month, each of Trichlor, and Paint Solvent, and 2 drums per month of a mixture of Stoddard Solvent and Cutting Oil.

It is reasonable to assume that since our production was higher in the past, that we probably generated more waste in the past.

Let me know if you need further information.

A handwritten signature in cursive script, appearing to read "L. P. Rosell".

L. P. Rosell
Manager, Facilities Engineering

mkm

WASTE VENDORS AND AMOUNTS

1.

COMPANY	DATE	DESCRIPTION	AMOUNT	COST
Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	- 1,650 gal.	\$ 183.81
Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	- 1,650 gal.	-
Clark Oil	5/2/80	Solvent Waste Oil + H ₂ O	- 1,000 gal.	250.00
Clark Oil	8/25/80	Solvent Waste Oil + H ₂ O	- 1,425 gal.	356.20
Clark Oil	11/25/80	Stoddard Solvent Waste Oil	-	62.95
Clark Oil	1/30/81	Stoddard Solvent Waste Oil	- 850 gal.	44.20
Clark Oil	6/11/81	Stoddard Solvent Waste Oil	- 611 gal.	97.76
- All oils reclaimed and resold -				

2.

COMPANY	DATE	DESCRIPTION	AMOUNT	COST
Environmental	8/14/81	Stoddard Solvent	- 191 gal.	\$ 353.35
Processing	10/19/81	Stoddard Solvent	- 220 gal.	401.00
Services	1/18/82	Paint Thinner	- 148 gal.	273.00
	4/15/82	Stoddard Solvent	- 495 gal.	915.75
	8/26/82	Stoddard Solvent	- 275 gal.	508.75
- All solvents reclaimed and resold -				

3.

COMPANY	DATE	DESCRIPTION	AMOUNT	COST
Solvent Resource	4/14/81	1,1,1 Trichloroethane	- 275 gal.	\$ -
Recovery	4/14/81	Waste Paint Thinner	- 110 gal.	-
	8/7/81	Reconditioned Thinner	- 165 gal.	387.75
- All solvent and thinners reclaimed and resold -				

4.

TRICIL	DATE	DESCRIPTION	AMOUNT	COST
Environmental	12/17/76	1,1,1 Trichloroethane	- 270 gal.	\$ 20.00
Services, Inc.	12/23/76	Waste	-	-
		1,1,1 Trichloroethane	660 gal.	792.00
	1/4/77	Waste	-	-
		1,1,1 Trichloroethane	440 gal.	572.00
	1/4/77	Waste	-	-
		Waste Oil & Stoddard	660 gal.	110.00
		Solvent	-	-
Systech Liquid	4/1/77	Waste Oil & Stoddard	3,135 gal.	285.00
Treatment Corp		Solvent	-	-
	6/23/77	1,1,1 Trichloroethane	-	-
		Waste	2,530 gal.	230.00
	9/9/77	1,1,1 Trichloroethane/	-	-
		Oil Stoddard	2,310 gal.	210.00
	1/1/78	1,1,1 Trichloroethane/	-	-
		Oil Stoddard	2,200 gal.	200.00
	5/19/78	Waste Solvents/Oil/Water	2,750 gal.	250.00
	8/13/81	Electroless Copper/	-	-
		Synthetic Coolant	3,080 gal.	1,680.00
	8/17/81	Electroless Copper	1,155 gal.	630.00
- Solvents reclaimed and sold back to Hobart -				

5.

COMPANY	DATE	DESCRIPTION	AMOUNT	COST
Emery Joseph	3/17/76	Solvents/Oil/Water	- 550 gal.	\$ 50.00
Sepeck	7/19/76	Solvents/Oil/Water	- 770 gal.	70.00
THIS WASTE WAS HABLED TO LOCAL LANDFILL.				

EXHIBIT IV

SUMMARY OF WASTES FROM 3/17/76 THRU 10/19/81

SEQ.	RECLAIMER/HAULER	DATE	DESCRIPTION	AMOUNT	COST
1	Emery Joseph Sepeck	3/17/76	Waste Solvents/Oil/Water	-550 gal.	\$ 50.00
2	Emery Joseph Sepeck	7/19/76	Waste Solvents/Oil/Water	-770 gal.	70.00
3	Systech Liquid Treatment	12/17/76	1,1,1 Trichloroethane (Used)	-770 gal.	20.00
4	Systech Liquid Treatment	12/23/76	1,1,1 Trichloroethane (Used)	-660 gal.	792.00
5	Systech Liquid Treatment	1/4/77	1,1,1 Trichloroethane (Used)	-440 gal.	572.00
6	Systech Liquid Treatment	1/4/77	Oil/Stoddard Solvent Waste	- 660 gal.	110.00
7	Systech Liquid Treatment	4/1/77	Oil/Stoddard Solvent Waste	3,135 gal.	285.00
8	Systech Liquid Treatment	6/23/77	1,1,1 Trichloroethane Waste	2,530 gal.	230.00
9	Systech Liquid Treatment	9/9/77	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,310 gal.	210.00
10	Systech Liquid Treatment	1/1/78	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,200 gal.	200.00
11	Systech Liquid Treatment	5/19/78	1,1,1 Trichloroethane Stoddard Solvent/Oil/Water	2,750 gal.	250.00
12	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	183.81
13	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	-
14	Clark Oil Company	5/2/80	Stoddard Solvent Waste Oil and Water	1,000 gal.	250.00
15	Clark Oil Company	8/25/80	Stoddard Solvent Waste Oil and Water	1,425 gal.	356.20
16	Clark Oil Company	11/25/80	Waste Oil/Stoddard Solvent	-	62.95
17	Clark Oil Company	1/30/81	Waste Oil/Stoddard Solvent	-850 gal.	44.20
18	Solvent Resource Recovery	4/14/81	1,1,1 Trichloroethane Waste	-275 gal.	-
19	Solvent Resource Recovery	4/14/81	Paint Thinner Waste	- 110 gal.	-
20	Clark Oil Company	6/11/81	Stoddard Solvent/Spdle. Oil	- 611 gal.	91.76
21	Solvent Resource Recovery	6/7/81	Paint Thinner Waste	- 165 gal.	387.75
22	TriCil Environmental	8/13/81	Electroless Copper and Synthetic Coolant	3,080 gal.	1,680.00
23	Environmental Processing	8/14/81	Stoddard Solvent	- 191 gal.	353.55
24	Environmental Processing	10/19/81	Stoddard Solvent	- 220 gal.	407.00
(1976 thru 1981)				TOTALS	27,452 gal. \$ 6,612.22

EXHIBIT V

HOWARD
LABORATORIES,
INC.

3601 S. DIXIE DRIVE
DAYTON, OHIO 45430
(513) 294-6856

NATIONAL BUSINESS
POST OFFICE BOX 368
DAYTON, OHIO 45449

April 22, 1981

ANALYTICAL RESULTS

No. 7469

HOWARD CORPORATION
Commercial Division
8. Ridge Ave. at Court St.
Troy, Ohio 45374

Attn: Les Roselle

Sample: Howard Mfg. Paint Sludge Sample Received 4-10-81

0512440

Ignitability - Flash Point

88°C

Toxicity:

Sample was prepared as designated in Extraction Procedure per Federal Register,
May 19, 1980.

Leachate analyzed as follows:

	mg/L	water contaminant standards
Arsenic	<0.004	50 ug/L 0.5 mg/L
Barium	0.053	1000 mg/L 100 mg/L
Cadmium	0.012	10 ug/L 0.1 mg/L
Lead	<0.010	50 ug/L 0.5 mg/L
Mercury	0.0004	1 ug/L 0.2 mg/L
Nickel	<0.010	
Selenium	<0.005	10 ug/L 0.1 mg/L
Silver	<0.010	100 ug/L 10 mg/L
Chromium	0.020	50 mg/L 0.5 mg/L
Hexavalent Chromium	0.014	

pH Adjustment Information:

Initial pH	4.80 S.H.
Final pH	5.20 S.U.
mls 0.5N Acetic Acid/gr sample	0.00 mls

< - Less than

John A. Anderson
Approved

ENVIRONMENTAL CONSULTING

WATER QUALITY MONITORING

BACTERIOLOGICAL & CHEMICAL ANALYSES

BOWSER-MORNER Testing Laboratories, Inc.

CORPORATE ADDRESS • 476 W. Ave. • P.O. Box 51 • Dayton, Ohio 45401 • 513/253-8800
TOLEDO DISTRICT • 122 S. St. Clair St. • P.O. Box 479 • Toledo, Ohio 43606 • 419/755-8200
KENTUCKY DISTRICT • Route 2 West • P.O. Box 636 • Mayfield, Kentucky 41056 • 606/564-5308

LABORATORY REPORT

Hobart Corporation
216 South Torrence Street
Report to: Dayton, Ohio 45403
Attn: Mr. Les Rosell

Date: March 3, 1981
Laboratory No. L 021861
Authorization:

Report on: Two (2) coolant water samples were received on February 18, 1981
for soluble metal analysis.

SAMPLE INFORMATION:

The coolant water samples were identified as:

Hobart Corporation #1 Discool
#2 Kleen Kool

The coolant solutions contained a biodegradable additive.

TEST PROCEDURES:

- 1) The coolant water samples were filtered through 0.45 micrometer membrane filters for soluble (dissolved) metals analysis.
- 2) Quantitative analysis of soluble metal concentrations performed by atomic absorption spectroscopy.

TEST RESULTS:

Coolant Water Sample

Parameter	Discool	Kleen Kool
Aluminum, mg/l	5.1	0.2
Chromium, mg/l	0.12	0.05
Copper, mg/l	2.72	0.03
Lead, mg/l	0.64	0.23
Zinc, mg/l	7.75	3.25

Respectfully Submitted,

BOWSER-MORNER Testing Laboratories, Inc.

Michael W. Zimmerman

Michael W. Zimmerman
Environmental Chemist
Analytical Chemistry Laboratory

1-Client
2-File
MWZ/pc



As a Mutual Protection to Clients, the Public and Ourselves, All Reports Are Submitted as the Confidential Property of Clients, and Authorization for Publication of Statements, Conclusions or Extracts from or Regarding Our Reports is Reserved Pending Our Written Approval.

BOWSER-MORNER Testing Laboratories, Inc.

CORPORATE ADDRESS • 420 Oak Ave • P.O. Box 51 • Dayton, Ohio 45401 • 513/253-8805
TOLEDO DISTRICT • 122 S. St. Clair St. • P.O. Box 838 • Toledo, Ohio 43696 • 419/255-8200
KENTUCKY DISTRICT • Route 8 West • P.O. Box 836 • Mayville, Kentucky 41056 • 606/564-5308

LABORATORY REPORT

Hobart Corporation
216 South Torrence Street
Report to: Dayton, Ohio 45403
Attn: Mr. Les Rosell

Date: March 10, 1981
Laboratory No. L 021861A
Authorization: 41101

Report on: Two (2) Coolant Water Samples Received February 18, 1981 for
Additional Analysis of Soluble Cadmium and Mercury.

SAMPLE INFORMATION:

The coolant water samples were identified as:

Hobart Corporation: #1 Discool
#2 Kleen Kool

The coolant solutions contained a biodegradable additive.

TEST PROCEDURES:

- 1) The coolant water samples were filtered through 0.45 micrometer membrane filters for soluble (dissolved) metals analysis.
- 2) Quantitative analysis of soluble metal concentrations performed by atomic absorption spectrophotometry.
- 3) All analyses performed in accordance with Standard Methods for the Examination of Water and Wastewater, 14th Edition, 1975.

TEST RESULTS:

Parameter	Discool	Kleen Kool
Cadmium, mg/l	0.18 μ g/l	0.29 μ g/l
Mercury, mg/l	<0.01 μ g/l	<0.01 μ g/l

Respectfully Submitted,

BOWSER-MORNER Testing Laboratories, Inc.

Michael W. Zimmerman
Michael W. Zimmerman
Environmental Chemist
Analytical Chemistry Laboratory



1-Client
2-File
MWZ/pc

As a Mutual Protection to Clients, the Public and Ourselves, All Reports Are Submitted as the Confidential Property of Clients, and Authorization for Publication of Statements, Conclusions or Extracts from or Regarding Our Reports is Reserved Pending Our Written Approval



WORLD HEADQUARTERS

TROY, OHIO 45374

March 23, 1984

TO Jim Carleton
FROM Tom Stokes
SUBJECT Dayton Scale Waste Disposal

COPIES TO

1976 TO PRESENT DISPOSITION OF
DAYTON SCALE WASTES

1. Clark Oil Company - (513) 268-6501 - Sold November 1980. No records prior to this date. Picked up stoddard solvent, spindle and light cutting oils, hydraulic oils, some synthetic vegetable coolants. No 1,1,1 Trichloroethane or paint solvents.
2. Systems Technology Liquid Treatment - 429-2533 - Is now Tri-cil Environmental Services. They have all of Systech's records. (513/228-9532) The representative I talked to is Chuck Cody. He will have to get records from old still in Franklin, Ohio and will take about one week to complete. New records from 1981 to present on manifests can be checked easily.
3. Solvent Resource Recovery - (513) 859-6101 - Representative Joe Hanehan. Under EPA #OHD 004237434, Hobart.
M 8 11193, 4-14-81, 275 gallons 1,1,1 Trichloroethane.
M 8 11193, 4-14-81, 110 gallons Paint Thinner.
Both solvents reclaimed and sold to another customer.

A handwritten signature, likely of the representative Joe Hanehan, in cursive script.



WORLD HEADQUARTERS

TROY, OHIO 45374

April 2, 1984

TO : J.J. Carleton

COPIES TO

FROM : T.W. Stokes

SUBJECT: Dayton Scale Waste Liquids Disposal
from 1976 through 1982

Per your request, I prepared the following summary of Dayton Scale's liquid waste disposal from March 17, 1976 to October 19, 1981 and additional information through August 26, 1982. All information supplied is validated by invoices, bills of lading, check vouchers or checks made payable to the disposal companies. These records were furnished by the disposal companies, Hobart Accounts Payable Department and Records Retention in Troy.

Names of those companies which were responsible for the reclaiming or disposal of these wastes were made available by Lester P. Rosell who was the Plant Engineer of Dayton Scale who contracted with five different companies to dispose of his waste oils and solvents.

I contacted these five waste disposal companies: Clark Oil Company, Environmental Processing Services, Solvent Resource Recovery, Systech Liquid Treatment Corporation and TriCil Environmental Services, Inc. who now own Systech Liquid Treatment. The last company was Emery Joseph Sepeck a local waste hauler who you personally contacted. All companies except Sepeck responded with documents of some type except Emery Joseph Sepeck. We have two bills which were paid to this hauler to remove liquid waste in 1976.

I believe all of the wastes are accounted for in my attached summary. All disposal companies except Sepeck reclaimed all of the oils, solvents and thinners and either sold them back to Hobart or to another company. Emery Joseph Sepeck claims he never disposed of any liquid wastes outside of Montgomery County, Ohio.

I believe this information will assist you very well. Will try to provide additional if requested.

A handwritten signature in cursive script, appearing to read "Tom Stokes".

Tom Stokes

:sma
Attachment

WASTE VENDORS AND AMOUNTS

1.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	1,650 gal.	\$ 183.81
	Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	1,650 gal.	-
	Clark Oil	5/2/80	Solvent Waste Oil + H ₂ O	1,000 gal.	250.00
	Clark Oil	8/25/80	Solvent Waste Oil + H ₂ O	1,425 gal.	356.20
	Clark Oil	11/25/80	Stoddard Solvent Waste Oil		62.95
	Clark Oil	1/30/81	Stoddard Solvent Waste Oil	850 gal.	44.20
	Clark Oil	6/11/81	Stoddard Solvent Waste Oil	611 gal.	97.76

- All oils reclaimed and resold -

2.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Environmental	8/14/81	Stoddard Solvent	191 gal.	\$ 353.35
	Processing	10/19/81	Stoddard Solvent	220 gal.	407.00
	Services	1/18/82	Paint Thinner	148 gal.	273.00
		4/15/82	Stoddard Solvent	495 gal.	915.75
		8/26/82	Stoddard Solvent	275 gal.	508.75

- All solvents reclaimed and resold -

3.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Solvent Resource	4/14/81	1,1,1 Trichloroethane	275 gal.	\$ -
	Recovery	4/14/81	Waste Paint Thinner	110 gal.	-
		8/7/81	Reconditioned Thinner	165 gal.	387.75

- All solvent and thinners reclaimed and resold -

4.	TRICIL	DATE	DESCRIPTION	AMOUNT	COST
	Environmental	12/17/76	1,1,1 Trichloroethane		
	Services, Inc.		Waste	220 gal.	\$ 20.00
		12/23/76	1,1,1 Trichloroethane		
			Waste	660 gal.	792.00
		1/4/77	1,1,1 Trichloroethane		
			Waste	440 gal.	572.00
		1/4/77	Waste Oil & Stoddard		
			Solvent	660 gal.	110.00
	Systech Liquid	4/1/77	Waste Oil & Stoddard		
	Treatment Corp		Solvent	3,135 gal.	285.00
		6/23/77	1,1,1 Trichloroethane		
			Waste	2,530 gal.	230.00
		9/9/77	1,1,1 Trichloroethane/		
			Oil Stoddard	2,310 gal.	210.00
		1/1/78	1,1,1 Trichloroethane/		
			Oil Stoddard	2,200 gal.	200.00
		5/19/78	Waste Solvents/Oil/Water	2,750 gal.	250.00
		8/13/81	Electroless Copper/		
			Synthetic Coolant	3,080 gal.	1,680.00
		8/17/81	Electroless Copper	1,155 gal.	630.00

- Solvents reclaimed and sold back to Hobart -

5.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Emery Joseph	3/17/76	Solvents/Oil/Water	550 gal.	\$ 50.00
	Sepeck	7/19/76	Solvents/Oil/Water	770 gal.	70.00
		THIS WASTE WAS HAULED TO LOCAL LANDFILL.			

SUMMARY OF WASTES FROM 3/17/76 THRU 10/19/81

SEQ.	RECLAIMER/HAULER	DATE	DESCRIPTION	AMOUNT	COST
1	Emery Joseph Sepeck	3/17/76	Waste Solvents/Oil/Water	550 gal.	\$ 50.00
2	Emery Joseph Sepeck	7/19/76	Waste Solvents/Oil/Water	770 gal.	70.00
3	Systech Liquid Treatment	12/17/76	1,1,1 Trichloroethane (Used)	220 gal.	20.00
4	Systech Liquid Treatment	12/23/76	1,1,1 Trichloroethane (Used)	660 gal.	792.00
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7	Systech Liquid Treatment	4/1/77	Oil/Stoddard Solvent Waste	3,135 gal.	285.00
8	Systech Liquid Treatment	6/23/77	1,1,1 Trichloroethane Waste	2,530 gal.	230.00
9	Systech Liquid Treatment	9/9/77	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,310 gal.	210.00
10	Systech Liquid Treatment	1/1/78	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,200 gal.	200.00
11	Systech Liquid Treatment	5/19/78	1,1,1 Trichloroethane Stoddard Solvent/Oil/Water	2,750 gal.	250.00
12	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	183.81
13	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	-
14	Clark Oil Company	5/2/80	Stoddard Solvent Waste Oil and Water	1,000 gal.	250.00
15	Clark Oil Company	8/25/80	Stoddard Solvent Waste Oil and Water	1,425 gal.	356.20
16	Clark Oil Company	11/25/80	Waste Oil/Stoddard Solvent		62.95
17	Clark Oil Company	1/30/81	Waste Oil/Stoddard Solvent	850 gal.	44.20
18	Solvent Resource Recovery	4/14/81	1,1,1 Trichloroethane Waste	275 gal.	
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20	Clark Oil Company	6/11/81	Stoddard Solvent/Spdle. Oils	611 gal.	97.76
21	Solvent Resource Recovery	8/7/81	Paint Thinner Waste	165 gal.	387.75
22	TriCil Environmental	8/13/81	Electroless Copper and Synthetic Coolant	3,080 gal.	1,680.00
23	Environmental Processing	8/14/81	Stoddard Solvent	191 gal.	353.55
24	Environmental Processing	10/19/81	Stoddard Solvent	220 gal.	407.00
(1976 thru 1981)				TOTALS	27,452 gal. \$ 6,612.22



WORLD HEADQUARTERS

TROY, OHIO 45374

January 25, 1990

TO J. J. Carleton
FROM J. J. Bedwell
SUBJECT Powell Road Landfill

COPIES TO
M. Swiger

The Powell Road Landfill has been closed for about seven years. This would make it about year 1982. Dayton Service Parts Center moved into the Huffman Facility June of 1982. From June 1982 to present, D.S.P.C. has used G.S.X. of Dayton for disposal of Non-Hazardous waste, trash only. This is a sister company of Laidlaw Waste Systems located at 1766 North Gettysburg Avenue, Dayton, Ohio. I checked with them and they stated that all of our trash waste has been disposed of at the Montgomery County South Incinerator Plant, 2550 Bertwynn Drive, Moraine, Ohio.

On August 12, 1985, D.S.P.C. had Ecolotec Inc., 716 North Irvin Street, Dayton, Ohio dispose of 3,100 pint cans of Epoxy Sealant. This waste was disposed of by incineration. This was Non-Hazardous, Non-Regulated material. The profile code is EC-7289.

In checking with other waste disposal companies in the Dayton area who may have disposed of, or hauled waste for us before or after 1982 were:

- ° Emery J. Sepeck, 4330 Springfield Pike, System Technology of Xenia, Ohio. These companies are no longer operational.
- ° Industrial Waste Disposal, 3975 Wagoner Ford Road, never removed waste for Hobart Corporation.
- ° Clark Oil Company of Dayton, 300 West End Avenue, never used Powell Road Landfill. Reclaimed Product only.

This is all of the information we have been able to find. It looks like we may never have contributed to the Powell Road Landfill.

Let me know if you need further information.

Joseph J. Bedwell
Joseph J. Bedwell
Safety CO-OR D.S.P.C.

/1.53

ENVIRONMENTAL SITE ASSESSMENT
OF
448 HUFFMAN AVENUE
DAYTON, OHIO 45403

Prepared for:
Mr. Samuel W. Lumby
Lumco Realty Company
322 Davis Avenue
Dayton, Ohio 45403

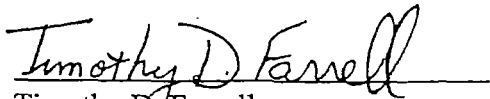
Prepared by:
ERAtch Environmental, Inc.
PO Box 250
Dayton, OH 45449
(513) 859-8998

August 1, 1995

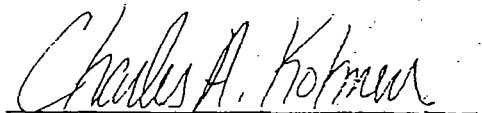
95-1685

ERatech ENVIRONMENTAL, INC.
SITE ASSESSMENT TEAM
FOR
448 HUFFMAN AVENUE
DAYTON, OHIO 45403

LEAD SITE ASSESSOR:


Timothy D. Farrell
Geologist

HISTORICAL RESEARCH


Charles A. Kohnen, AEPA
Site Assessor

REVIEWED BY:

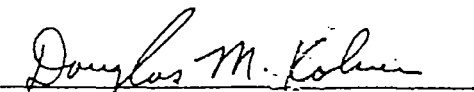

Douglas M. Kohnen, REPA
President

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Appendix J:	Qualifications of ERAtech Environmental, Inc. Personnel

1.0 SUMMARY

On behalf of Mr. Samuel Lumby of Lumco Realty Company, ERAtech Environmental, Inc. conducted a Phase I Environmental Site Assessment of the property located at 448 Huffman Avenue in Dayton, Ohio.

This Phase I Assessment includes:

- A review of publicly available documents relevant to the environmental condition of the site and adjoining properties.
- An investigation of the past and present land use activities of the site and adjoining properties.
- A visual inspection of the site to survey for signs of contamination and potential environmental liability.

This Phase I Site Assessment concludes that ownership of this property presents a degree of environmental risk. Recognized environmental conditions (RECs) uncovered during this investigation include unknown historical waste disposal practices, presence of gasoline filling stations in the 1920s and 1930s, contamination found in the soils at a UST removal, the lack of sampling and analysis at another UST removal and the potential presence of asbestos-containing materials and lead-based paints.

2.0 INTRODUCTION

ERAtch Environmental, Inc. has performed a Phase I Environmental Site Assessment of the approximate 3.8 acre site and its associated building located at 448 Huffman Avenue in Dayton, Ohio.

2.1 Purpose

This Phase I Site Assessment provides Mr. Lumby with a "due diligence" property assessment to determine the potential environmental liability associated with ownership of the property. The assessment was conducted to determine if current or past uses of the property have had an adverse effect on the environmental condition of the property.

2.2 Special Terms and Conditions

Disclosure of the contents of this report is at Mr. Lumby's discretion. ERAtch Environmental, Inc. places no restrictions on the reproduction or distribution of this report, other than reproductions must be made of the entire report to avoid the dissemination of out-of-context information.

2.3 Limitations and Exceptions of Assessment

A Phase I Assessment is a non-intrusive investigation including an inspection of the property and all structures on it, a visual inspection of the surrounding properties, and a review of available records to help identify potential recognized environmental conditions (RECs) in relation to current and former activities on the property and surrounding properties. In no manner was any environmental media sampled or analyzed as part of this Phase I.

2.4 Limiting Conditions and Methodology Used

All work was conducted in accordance with ASTM E 1527-94, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, as well as generally accepted standards of competent professionals practicing in the area of environmental site assessments. The qualifications of ERAtech Environmental, Inc. personnel are found in Appendix J.

3.0 SITE DESCRIPTION

The approximate 167,000 square foot building on the subject property is owned by the Hobart Corporation and is currently occupied by the PMI Food Equipment Group, a division of the Hobart Corporation. The building is currently used as a warehouse and distribution center for commercial parts. Some light maintenance and repair of returned equipment takes place at the facility. Prior to 1982 the facility was used by the Hobart Corporation for manufacturing commercial scales and *Kitchen Aid* appliances.

3.1 Location and Legal Description

According to information collected from records located at the Montgomery County Administration Building, the site includes Parcel Numbers R72-022-10-0002 through 006 and is approximately 3.8 acres in size. The subject property is located at 448 Huffman Avenue, Dayton, Ohio 45403.

3.2 Site and Vicinity Characteristics

The site is located on the south side of Huffman Avenue, just west of Linden Avenue. State Route 35 is less than one-half mile south of the site. Industrial and residential properties are located in the immediate vicinity of the property. The site is bordered on the north by residential property; on the east by the Hewitt Soap Company; on the west by Osterfeld Champion Service, Inc. And on the south by railroad tracks.

The approximate 3.8 acre site is roughly rectangular in shape, as illustrated in the Site Plan, (Appendix C). The property consists of a large warehouse/distribution building on a paved lot. Direct access to the property is provided by a paved entryway from Huffman Avenue.

3.3 Description of Improvements

There is one large structure on the subject property. It stands five stories high with a basement, and is approximately 167,000 square feet in size. It is currently used as a warehouse and distribution center for the PMI Food Equipment Group, a division of the Hobart Corporation. The building sits on approximately three-fourths of the lot, with a paved parking area taking the other one-fourth of the west side of the building. The top five floors are used mainly for storage and warehouse purposes. The fifth floor has a small area used for maintenance and repair of field-returned equipment. The first floor is the active warehouse area where the shipping occurs. The building is constructed of wood, concrete and steel. The floors are mostly concrete with some of the newer floors finished with wood. Walls inside the building are finished with brick, concrete and plaster and some dry-wall. The building exterior is finished with sprayed-on tar, brick and glass. The building has a vinyl roof with sprayed-on insulation.

3.4 Utility Service

Dayton Power & Light Company (DP&L) provides gas and electric services to the site. Water is provided by the City of Dayton; sewer services are maintained by Montgomery County.

3.5 Physical Setting

The elevation of the site is approximately 765 feet above mean sea level (MSL). The surrounding land is generally level. Surface storm water flows into storm drains located on-site and along Huffman Avenue. Groundwater is assumed to be traveling in a westerly direction toward the Great Miami River, which is located approximately two and one-fourth miles west of the subject property. The possibility exists that the City of Dayton's Mad River Wellfield could seasonally affect the groundwater flow direction at this site. This wellfield is located approximately one and one-half miles north of the site across the Mad River.

3.6 Soils

The generalized pedology of the site was determined from the United States Department of Agriculture (USDA) Soil Conservation Services (SCS) Soil Survey of Montgomery County. The site is characterized by the Fox-Urban land complex, gently sloping (FuB). The soils in this unit are nearly level to gently sloping. They occupy stream terraces that have been developed for residential and industrial use. Most areas have been disturbed or buried by filling and other earth-moving operations. These soils are well drained in most places and are mostly underlain by calcareous sand and gravel. Because permeability in the underlying sand and gravel is rapid, groundwater pollution is a hazard. This sand and gravel is an excellent source of groundwater and should be protected from pollution.

3.7 Zoning

According to the City of Dayton's Zoning Department, the property is located in an area zoned I-3, a heavy industrial district.

3.8 Flood Zone/Wellfield Protection/Sensitive Area

According to the Flood Insurance Rate Map, provided by the Federal Emergency Management Agency, the site is located in Flood Zone C, an area of minimal flooding. This information was taken from Community Panel Number 390409 0025C. This map was revised on March 4, 1985.

According to Mr. Greg King, Wellfield Protection Specialist with the Combined Health District of Montgomery County, the subject property does not lie within any of the area Wellhead Protection Overlay Districts.

According to the USGS topographic map for Dayton North, Ohio, the site lies in Section 34, Range 7, Town 2. This is considered a "sensitive area", as defined by the Bureau of Underground Storage Tank Regulations (BUSTR). BUSTR has adopted this regulation for the protection of human health and the environment. BUSTR sensitive areas generally lie along rivers, streams and lakes. Stringent rules and regulations pertaining to secondary containment and leak detection systems for underground storage tanks must be followed in sensitive areas.

4.0 SITE HISTORY AND USAGE

ERAtch reviewed past ownership and usage of the property to identify any usage which could impact the present environmental condition of the property.

4.1 Chain of Ownership

The chronological history of ownership for the past 90-128 years is summarized in Table 1 below.

Table 1

Dates of Ownership of
448 Huffman Avenue
Dayton, Ohio

<u>Owner</u>	<u>Date of Ownership</u>
Parcel R72-022-010-0002 & 0003	
Hobart Corporation	1985 - Present
Hobart International (formerly Hobart Mfg. Co.)	1968 - 1985
Howard L. Zimmerman	1963 - 1968
Charles Zimmerman	1963
Mary F. Zimmerman	1919 - 1963
E.B. Lyons, heirs (Mary A. Lyon, et. al.)	?
E.B. Lyons	1873 - ?
William P. Huffman	1867 - 1873
Valentine Winters	Prior to 1867
Parcel R72-022-010-0004, 0005 & 0006	
Hobart Corporation	1985 - Present
Hobart Manufacturing Company	1934 - 1985
International Business Machines Co.	1933 - 1934
Dayton Scale Company	1922 - 1933
Computing Scale Company	1911 - 1922
Katherine Ozias, et. al.	?
O.O. Ozias	1909 - ?
Dayton Hydraulic Machinery Company	1906 - 1909
Bradley Cordage Company	Prior to 1906

The purpose of performing a historical ownership search is to try to obtain indications of possible detrimental environmental activities that may have occurred on the subject property. A recognized environmental condition (REC) was revealed during this historical investigation; the fact that the property has been used for heavy industry for at least 90 years.

(*NOTE: ERAtech Environmental is not a title research company; therefore these findings should not be considered a title search and should not be relied upon in determining clear title).

4.2 Aerial Photographs

The following dated aerial photographs were reviewed for possible industrial activity and other activities that may present an environmental risk to the subject property.

1949

The eastern portion of the subject property contains the large building which is presently on the site. Scattered structures/buildings appear on the west side of the building where, presently there is a parking lot. Railroad tracks are evident immediately south of the property. Residential property is located south of the railroad tracks and north of the site across Huffman Avenue. Industrial developments appears to be east and west of the site.

1968

No major changes are apparent to the properties north and south of the site. The present day Hewitt Soap structure is obvious immediately east of the site. The lot immediately west of the building (present day parking lot) has been cleared of most of the structures that were apparent in the 1949 photograph. Cars are now scattered throughout the lot, along with what appears to be a shed-like structure.

1975

Surrounding adjacent properties appear unchanged from the 1968 photograph. State Route 35 and the Linden Avenue-Wyoming Street connector have been completed south of the site. The property immediately west of the building is filled with cars and is apparently a parking lot of the Hobart

Building. No other structures are apparent on the site.

1980

No major changes are apparent to the subject property or adjacent properties. Two railroad cars or semi-trailers are parked immediately south of the Hobart parking lot. It is difficult to distinguish whether these railroad cars/semi-trailers are located on Hobart or the railroad property.

1987

No major changes to the subject property or any adjacent properties are readily apparent on this photograph.

No sign of environmental impairment of the subject property was observed on any of the aerial photographs, with the exception of unknown structures and related activities that occurred on the property immediately west of the building prior to Hobart taking over these parcels.

4.3 Williams and Polk City Directories

Williams and Polk City Directories were reviewed for the subject property and selected surrounding properties for evidence of past uses which may have led to current environmental impairment.

<u>Year</u>	<u>Street Address</u>	<u>Business Name</u>
1993	480 Huffman Avenue	Hewitt Soap Company
	448 Huffman Avenue	PMI Food Equipment Group (parts/repair operation)
	362 Huffman Avenue	H.J. Osterfeld Company (plumbing contractor)
	362 Huffman Avenue	Osterfeld Champion Service (plumbing, heating A.C. repair)
1947	480 Huffman Avenue	H.K. Ferguson Co. (Management engineers)
	436 - 438 Huffman Ave.	Dayton Scale Division of Hobart Manufacturing Co.
	426 Huffman Avenue	Miami Builders Supply
	358 - 414 Huffman Avenue	Rinder Knecht Lumber Co. (Lumber yards)
	350 Huffman Avenue	Miami Valley Tool & Die Co. (Manufacturers)
1941	480 Huffman Avenue	United Aircraft Products (Airplane parts)
	480 Huffman (rear)	Quality Steels
	436-468 Huffman	Dayton Scale Division of the Hobart Mfg. Co.

1941	426 Huffman Avenue	Miami Builders Supply
	362 Huffman Avenue	Rinderknecht Co.
	358 Huffman Avenue	Rinderknecht Lumber Co. (Lumber yards)
1936	480 Huffman Avenue	Service Tool & Engineering (Tool mfg.)
	480 Huffman (rear)	Quality Steel
	472 Huffman Avenue	Gem City Sheet Metal & Manufacturing Co.
	448 Huffman Avenue	Dayton Scale
	430 Huffman Avenue	Schaeffer Oils, Inc. (Filling station)
	426 Huffman Avenue	Miami Builders Supply
	362 Huffman Avenue	Rinderknecht Company
	358 Huffman Avenue	Rinderknecht Lumber Co. (Lumber yards)
1931	480 Huffman Avenue	Service Tool & Engineering
	480 Huffman Avenue	William E. Stockstill (high grade coal & coke)
	480 Huffman Avenue	National Air Filter Co.
	480 Huffman Avenue	Blatz Brewing Co. of Milwaukee (cereal beverages)
	480 Huffman Avenue	United Aircraft Products (manufacturers of airplane accessories)
	480 Huffman (rear)	Chicago Beverage Co. (Dist. Of Edelweiss Buck products)
	472 Huffman Avenue	Gem City Sheet Metal & Manufacturing Co.
	448 Huffman Avenue	Dayton Scale Co.
	430 Huffman Avenue	Cities Petroleum Corp. (Gas station)
	426 Huffman Avenue	Miami Builders Supply
	362 Huffman Avenue	Rinderknecht Company
1926	480 Huffman Avenue (southwest corner)	The Bocel Company (chemicals-wholesale)
	480 Huffman Avenue	The Dayton Automotive Wheel Co.
	436-468 Huffman Ave.	Dayton Scale Co.
	436-468 Huffman Ave.	Dayton Moneyweight Scale Co.
	436-468 Huffman Ave.	The Computing Scale Co.
	426 Huffman Avenue	The White Rock Oil Co.
	426 Huffman Avenue	The Ohio Barrel & Bag Co.
	362 Huffman Avenue	Rinderknecht Lumber Co.
1917-	480 Huffman Avenue (south side)	The Zwick & Greenwald Wheel Co. (Wheel mfg)
1918	468 Huffman Avenue	The Tabulating Machine Co.
	468 Huffman Avenue	American Automatic Scale Co.
	436 Huffman Avenue	The Computing Scale Co.
	426 Huffman Avenue	Ohio Barrel Co.
	362 Huffman Avenue	Rinderknecht Lumber Co.
1909-	480 Huffman Avenue (southwest corner)	Zwick & Greenwald Wheel Co.
1910	448 Huffman Avenue	The Dayton Hydraulic Machinery Co.
	436 Huffman Avenue	The Computing Scale Co.
	436 Huffman Avenue	Ohio Barrel Co. (Barrel dealers)
	362 Huffman Avenue	Rinderknecht Lumber Co.

4.4 Sanborn Fire Insurance Maps

From 1887 through 1950, the Sanborn Fire Insurance Company produced detailed maps of the populated areas of and around the City of Dayton. Three of these maps (circa 1898, 1918 and 1950) can be found in Appendix G. Below is a description of each of these maps.

1898 Edition

The Bradley Cordage Company was located on the east side of the subject property where the current building stands. The west side of the property (currently a parking lot), contained the E.B. Lyon Company, manufacturers of trunk strips, wooden trunk handles and excelsior.

A note on the Sanborn map states that the Bradley Cordage Company was "burned out" on February 7, 1898. Items of interest on the subject property at this time included a large cistern located near the center of the property, an "iron-oil tank" located along the fence line near the south edge of the property, and a well located just east of this tank. A machine room for storage and machining equipment and warehouses make up the bulk of the Bradley Cordage Company building. The E.B. Lyon Company consisted of a woodworking machine shop and warehouses along Huffman Avenue and numerous lumber piles on the south half of the site.

1918 Edition

The Computing Scale Company is located on the east side of the subject property at this time. The building at this time is basically in its present-day configuration. The east side of the building contains a printing shop, stock room, offices and a sheet metal grinding and polishing area. The west side of the building was used mainly for assembly and shipping/receiving. The north end of the building, along Huffman Avenue, housed the expansion metal department. The lot west of the building (present day parking lot) was home to the Ohio Barrel Company at this time. It consisted mainly of a cooper shop, barrel storage area and an office. The southeast corner of this lot contained a brass foundry. This is located immediately west of the Computing Scale Co. building near the shipping/receiving area.

1950 Edition

The Dayton Scale Division of Hobart Manufacturing Co. is now located on the subject property.

The facility set-up is basically unchanged from the 1918 edition, with the exception of building addition on the northwest side. It appears that the Hobart Company has expanded its land to the west. The building addition houses ovens and at least two lacquer spraying booths on the third floor. Immediately south of this building addition is the former brass foundry. This is now a sand blast area. The lot west of the building (present day parking lot) contains the Miami Builders Supply Co. Additions to this property include a coal yard along the south side of the property, a lime cement area along the railroad tracks and four to five gasoline storage tanks in the northeast corner of this parcel. It is not readily apparent whether these tanks are above or below ground level.

5.0 ENVIRONMENTAL RECORDS REVIEW

A review was made of publicly available records concerning 1) the usage and disposal of hazardous substances in the vicinity of the property to determine the potential impact from areawide sources of contamination; and 2) other issues of possible environmental impact. These records reviewed are discussed below.

5.1 National Priority List (NPL)

The NPL, also known as the Superfund list, is an Environmental Protection Agency list of uncontrolled or abandoned hazardous waste sites. These sites are targeted for possible long-term remedial action under the Superfund Act. There are four NPL sites in Montgomery County, Ohio. None of these sites is located within a one-mile radius of the subject property.

5.2 Emergency Response Notification System (ERNS)

ERNS is a national computer database system that is used to store information on accidental releases of hazardous substances, including petroleum, into the environment. The ERNS list contains preliminary information on specific releases, including the location, the substance released and the responsible party. The Emergency Response Notification System (ERNS) was reviewed with respect to the subject property. This property was not listed on the ERNS list.

5.3 Comprehensive Environmental Response Compensation and Liability Act List (CERCLIS)

Division of Emergency and Remedial Response (DERR): The Master Sites List is an expansion of the USEPA's CERCLIS inventory of known sites where hazardous substances have been abandoned, stored or disposed of with the potential to cause an off site threat. The Master Sites list identifies 37 sites within Montgomery County.

The subject property at 448 Huffman Avenue is listed as a Master Site. Also, the Hobart facility at 216 South Torrence Street (approximately one-fourth mile northeast of the subject property) is on

the Master Site list. According to the Master Site List, the problem at both sites is groundwater sludge. The Torrence Street site is listed as a zero priority site. Zero priority sites are sites where there is evidence or it is suspected that hazardous waste has been managed but there is no potential for the release of hazardous waste. For this reason, the site on Torrence Street causes minimal environmental risk to the subject property. The subject property itself is listed as a low priority site. Low priority sites are also sites where there is evidence or it is suspected that hazardous waste has been managed, but there is potential for release of hazardous waste which may cause or contribute to or threaten to cause or contribute to air or water pollution or soil contamination. An Ohio EPA file search was conducted by ERAtech concerning the sites listed as Master Sites. Pertinent documents were copied from this file and are included in this report as an attachment in Appendix H. A preliminary assessment narrative, dated April 8, 1985, states that "the Huffman plant does not have any records showing the amounts of waste produced, until 1981." The narrative also states that "there is no evidence of hazardous wastes being disposed on the property . . ." The report states that wastes generated between 1960 and 1982 included 1,1,1 trichloroethane, cutting oils from degreasing, methyl ethyl ketone, xylene, paint, stoddard solvent and machining tool, water-based synthetic coolants contaminated with cutting oils and solvents. Amounts of wastes generated are unknown. The report states that generated wastes were transported to two local landfills between June 4, 1973 and July 5, 1976. No other information could be found showing the eventual destination of wastes generated prior to 1973. For this reason, a degree of risk exists with the ownership of this property.

5.4 OEPA Listing of RCRA Generators

Division of Solid and Hazardous Waste Management (DSHWM): The Ohio EPA RCRA files were reviewed to identify the existence of any permitted hazardous waste generation, treatment, storage, and/or disposal facilities in the near vicinity of the property, and evaluate their compliance status. The review revealed the existence of at least 52 RCRA generators within the area covered by zip code 45403. The subject property is listed as a RCRA generator. The generator status is not listed. This is probably because wastes are no long generated at this facility.

The Hewitt Soap Company at 333 Linden Avenue is listed as a small quantity generator (SQG)¹. This property is adjacent to the subject property, to the east. The Hewitt Soap Company is believed to be operating in compliance with current regulations; therefore they pose minimal environmental risk to the subject property.

5.5 OEPA Listing of Treatment, Storage and Disposal Facilities

There is no record of active commercial treatment, storage or disposal facilities within a one-mile radius of the subject property. Republic Environmental, which treats and stores hazardous waste, is located approximately one and one-fourth mile north of the subject property. Groundwater at the Republic site has been shown to be moving in a north or northeast direction away from the subject property.

OEPA, Division of Solid and Infectious Waste Management (DSIWM)

There is no record of licensed incinerators, transfer facilities or landfills within a half mile radius of the subject property.

5.6 Ohio State Fire Marshal, Bureau of Underground Storage Tank Regulation (BUSTR), Dayton, Ohio

The State Fire Marshal/Bureau of Underground Storage Tank Regulation (BUSTR) maintains records of leaking underground storage tanks (LUST) and incident reports for Montgomery County. According to State Fire Marshal records, there have been at least 31 underground storage tank (UST) incidents in the 45403 zip code area. Eight of these incidents occurred within one-half mile of the subject site. These sites are listed below:

- | | |
|--------------------------------------|---------------------------------------|
| (1) Hewitt Soap Company, Inc. | (2) H.J. Osterfeld Co. |
| 333 Linden Avenue (adjacent to east) | 362 Huffman Avenue (adjacent to west) |
| Status: No Further Action | Status: No Further Action |

¹Small quantity generators (SQGs) and large quantity generators (LQGs) are differentiated based on the amount of hazardous waste generated per month. Under RCRA Subtitle C (40 CFR Part 262) a SQG generates an amount greater than 100 kg (221 pounds), but less than 1,000 kg (2,210 pounds) per month of non-acutely hazardous waste. A LQG generates more than 1,000 kg (2,210 pounds) per month. A conditionally exempt generator (CEG) generates less than 100 kg (221 pounds) per month.

(3) Old Bowser-Morner Inc. Facility
420 Davis Avenue
Status: No Further Action

(4) Bill's Marathon
1627 East 3rd Street
Status: Reported

(5) Megacity Warehouse
200 Davis Avenue
Status: No Further Action

(6) First Tool Corp.
612 Linden Avenue
Status: Reported

(7) Butler Heating
120 Springfield Street
Status: No Further Action

(8) Multi-Service
58 Ring Gold Street
Status: Reported

Five of these sites have obtained "No Further Action" letters from BUSTR and they have determined that further corrective actions are not necessary. The other three sites have reported release incidents to BUSTR. These incidents either have not been investigated or the source of the release has not been determined. None of these sites appear to pose a major risk to the subject property.

Registered Underground Storage Tanks: There are no registered underground storage tanks (USTs) on the subject property or any adjacent properties.

6.0 SITE INSPECTION

On July 14, 1995, personnel from ERAtech Environmental, Inc. conducted on-site inspections of the property to survey for indicators of potential environmental liability on the property and in the area immediately surrounding the property. Tim Farrell and Doug Kohnen of ERAtech Environmental, Inc. conducted the on-site inspection of the property. ERAtech was accompanied by Mr. Joe Bedwell, a Safety Coordinator for PMI. The grounds were visually inspected for evidence of activities with potential for having a negative environmental impact to the subject property.

6.1 Industrial Wastewater Discharge

No active production has occurred at this facility since July 1982. No industrial wastewater is currently being discharged from this facility.

6.2 Solid Waste Disposal

There was no evidence of improper solid waste disposal on the subject property at the time of our site visit. Debris, wood pallets, and metal parts are scattered along the fence line on the south side of the property.

6.3 Visible Signs of Possible Contamination

There were no visible signs of contamination, such as stained soil or stressed vegetation, observed on site. Normal staining was observed in the parking lot from cars dripping fluids.

6.4 Hazardous Waste/Chemical Storage Areas

There were no hazardous waste storage areas located on site. Hazardous waste has not been generated at this facility since the early 1980s. It was not readily apparent where waste storage areas were located prior to the early 1980s. Normal amounts of cleaning fluids, lubricants and paints were stored in storerooms throughout the facility.

6.5 Storage Tanks

No aboveground storage tanks were observed on the subject property. Also, no vents or fill pipes associated with the presence of underground storage tank systems were observed. A 20,000 gallon fuel oil UST was removed from the site in September, 1989. Some contamination was found in the soils surrounding this tank. Additionally, a 600 gallon gasoline UST was removed from the parking lot in July, 1987. No documentation of sampling, analysis and proper closure is available.

6.6 Polychlorinated Biphenyls (PCBs)

40 CFR 761 requires owners of all PCB transformers (transformers containing greater than 50 parts per million (ppm) PCBs by weight) in use or within 30 meters of occupied buildings to register the transformer with the building owner of record. Information to be provided includes location, constituents of the dielectric fluid, and type of installation.

Three pole-mounted transformers were observed on the north side of the building along Huffman Avenue. Information concerning spill incidents and PCB content of these transformers was requested from the Dayton Power & Light Company. At the time of this report no information has been received from DP&L. These transformers appeared to be in good condition; no staining, which may indicate a leak, was observed on or around the transformers.

6.7 Asbestos-Containing Materials (ACM)

Asbestos-Containing Materials (ACM) are well-suited for many uses in the construction industry, and historically have been a common component of building materials. Although federal regulations since 1971 have systematically controlled or banned asbestos in construction materials, an asbestos-free building cannot be guaranteed without a thorough building survey and assessment in which samples are collected and identified.

Suspect ACM observed on site included plaster walls and ceilings, and pipe insulation. These materials are categorized as "suspect" and can only be sampled and assessed by individuals certified

in the State of Ohio as accredited Asbestos Hazard Evaluation Specialists. Depending on the quantity of ACM, federal, state and local regulations may require friable ACM be removed prior to demolition or renovation activities. Friable ACM contains asbestos and can be "crumbled or reduced to powder by hand pressure." In addition, the OSHA Construction Standard for Asbestos, 29 CFR 1926 strictly governs the protection of employees where they may be exposed when ACM are disturbed in any fashion.

According to Mr. Bedwell, an annual asbestos remediation project has been taking place on the second and other floors of the building for the last five years. This has included the encapsulation of a plaster ceiling in a warehouse area on the second floor. It is not known whether an asbestos survey has ever been completed at this site.

6.8 Lead Paint

Lead was a significant component of many types of paint used in construction prior to and through World War II. Lead is still used in some paints as a colorant and rust inhibitor where no suitable substitute can be found (i.e. paint on steel structures and roadways). In 1978, the Consumer Product Safety Commission banned the use of indoor lead-based paint, but this standard applies only to residential uses. Any commercial use of paint materials may be considered suspect as lead-containing, if applied before 1980. The United States Department of Housing and Urban Development (HUD) defines a lead-based paint hazard as a level of 1.0 milligrams per square centimeter.

In addition, the OSHA Construction Standard for Lead, 40 CFR 1926.62, applies to all construction work where an employee may be exposed to lead, and strictly governs the protection of those workers. Construction work is defined as construction, alteration and/or repair. It includes, but is not limited to, activity which involves demolition or renovation of lead-containing materials. Due to the age of the building (pre-1980) it is possible the paint in and on the structure contains lead. It is not known whether a lead assessment has been performed on the building. Some of the painted areas appeared to be in poor condition, with cracking, peeling and chipping observed. The paint, in its present condition, may pose a health risk. If renovation or demolition is planned, then all

layers of paint should be analyzed for lead.

6.9 Air Quality

There were no active air pollution sources observed on the subject property at the time of our site visit.

6.10 Resource Conservation and Recovery Act (RCRA) Permitting

According to information received from the Ohio EPA, the Hobart Corporation at 448 Huffman Avenue was considered a generator of RCRA hazardous waste and was given OEPA ID # OHD 071275630.

7.0 FINDINGS AND CONCLUSIONS

ERAtch Environmental, Inc. has performed a *Phase I Environmental Site Assessment* in conformance with the scope and limitations of ASTM Practice E 1527-94 of the approximate 3.8 acre parcel of land and its associated building at 448 Huffman Avenue in Dayton, Ohio. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

- The fact that the property is listed on the Ohio EPA's Master Sites List. Unknown historical waste disposal practices cause potential environmental risk to the site. It is recommended that Phase II sampling and analysis be performed to determine if groundwater and subsurface soils have been impacted.
- The presence of gasoline stations ostensibly located on the site of the present day parking lot on the subject property. Phase II sampling and analysis is recommended.
- The presence of low-level contamination from the 20,000-gallon fuel oil UST and the lack of any sampling and/or analysis associated with the 600-gallon gasoline UST that was removed from the parking lot area on the subject property. Phase II sampling and analysis is recommended.
- If renovation or demolition is to occur, it is recommended that the suspected asbestos (See Section 6.7) and suspected lead-based paint (See Section 6.8) be further reviewed.

The findings and conclusions stated in this report are valid only for the time this assessment was performed. Additional information concerning this property or adjacent properties which was not made available to ERAtch Environmental, Inc. or was outside of the contracted scope of services could modify the stated conclusion(s).

The Phase I assessment was prepared in accordance with the guidelines of ASTM E 1527-94, as well as generally accepted standards of competent professionals practicing in the area of environmental site assessments. The qualifications of ERAtech Environmental, Inc. personnel are provided in Appendix J.

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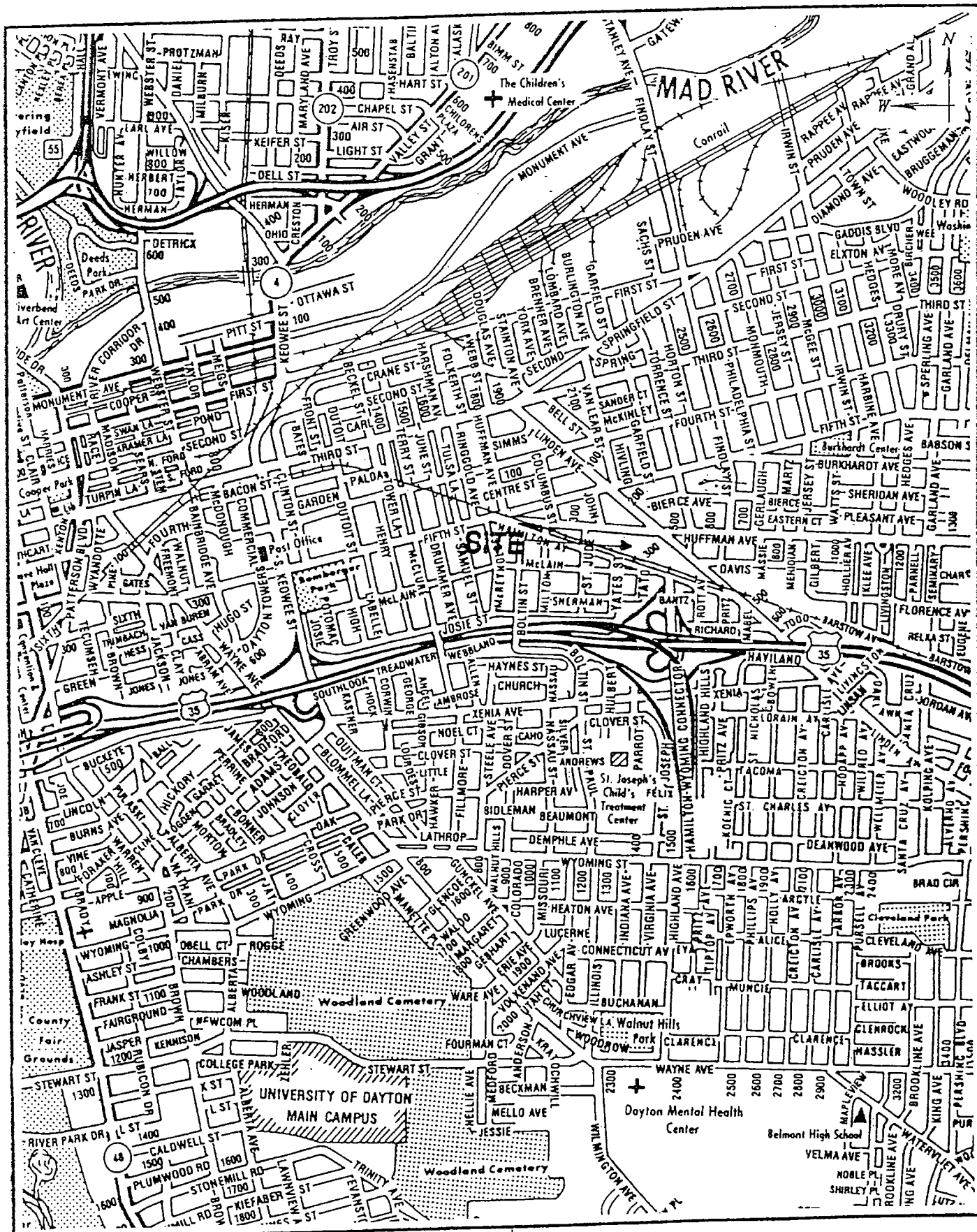
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Sanborn Fire Insurance Maps, circa 1898, 1918, 1950.

Soil Survey of Montgomery County, Ohio. U.S. Department of Agriculture, Soil Conservation Service in cooperation with the Ohio Department of Natural Resources, Division of Lands and Soils and the Ohio Agricultural Research and Development Center.

United States Geological Survey Maps, Dayton North, Ohio Quadrangle, 1965, Photo revised 1981, Photo inspected 1984, Reston, Virginia.

APPENDIX A
VICINITY MAP



ERAtech
Environmental inc.

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Dayton, Ohio 45449
(513) 859-8998

Title: VICINITY MAP

Project: 95-1685

Date: 7/31/95

APPENDIX B
TOPOGRAPHIC MAP



ERAtech
Environmental inc.

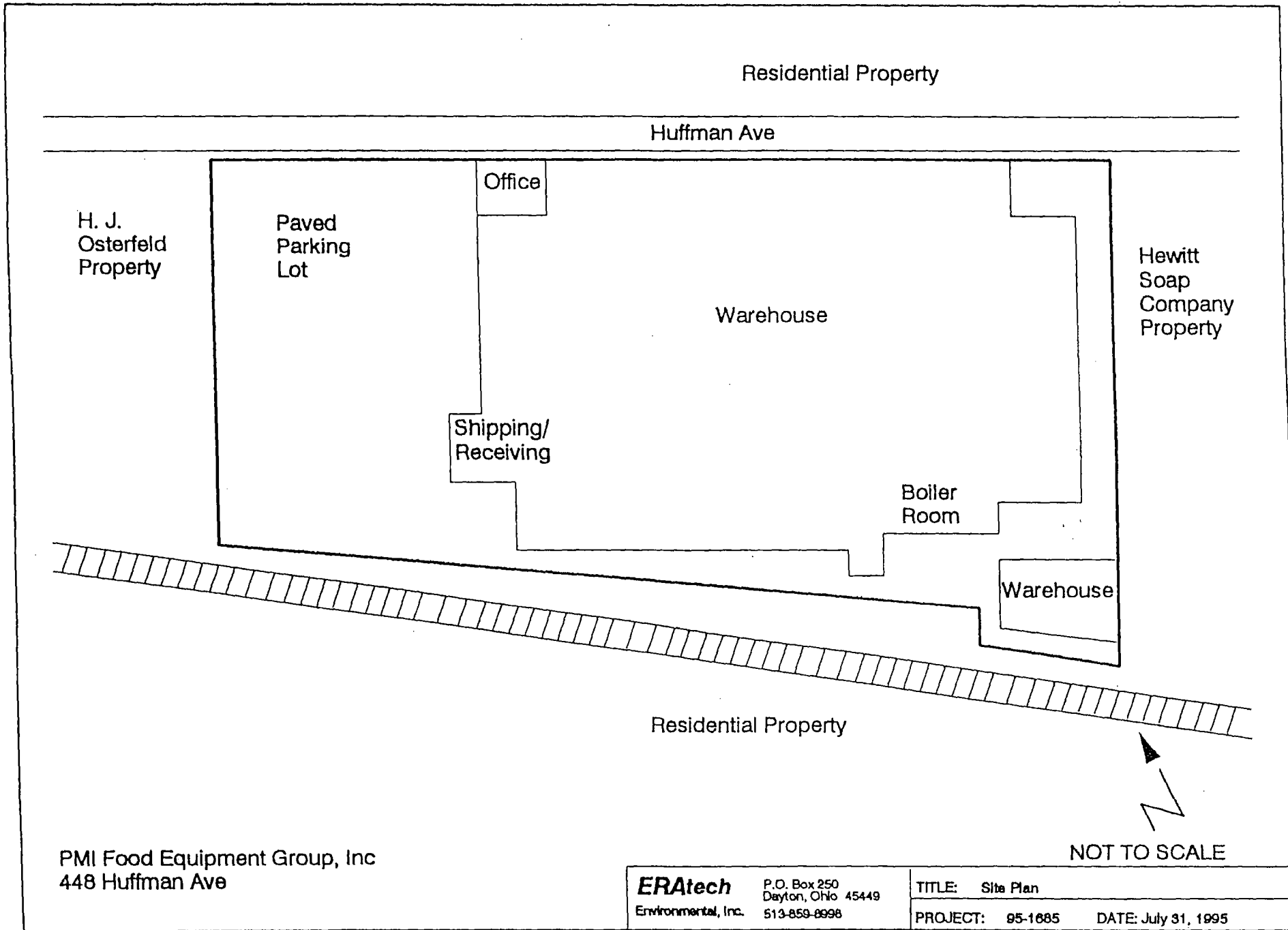
P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: TOPOGRAPHIC MAP

Project: 95-1685

Date: 7/26/95

APPENDIX C
SITE PLAN

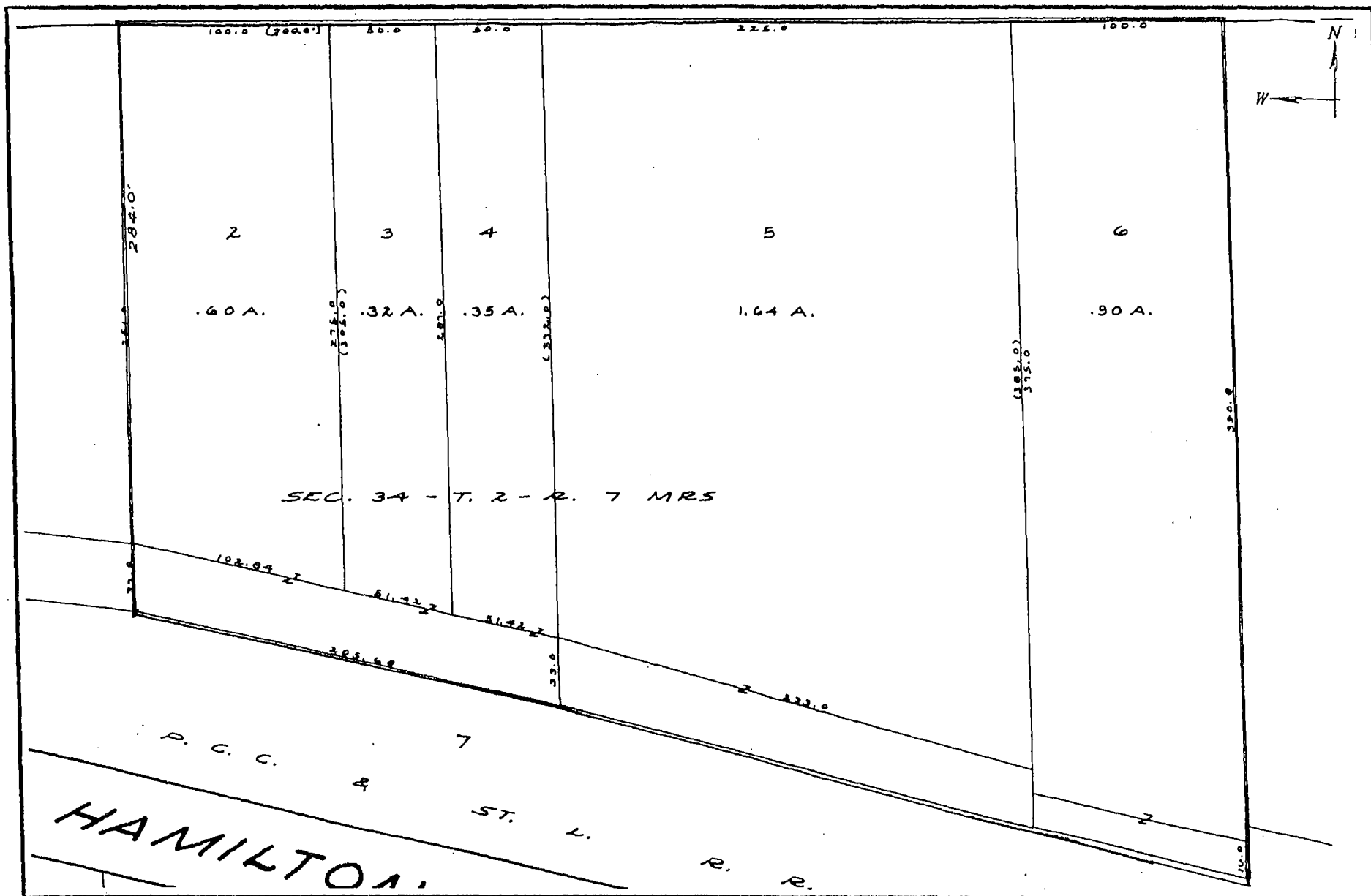


PMI Food Equipment Group, Inc
448 Huffman Ave

ERAtch Environmental, Inc.	P.O. Box 250 Dayton, Ohio 45449 513-859-8998	TITLE: Site Plan	
		PROJECT: 95-1685	DATE: July 31, 1995

APPENDIX D
SOILS MAP

APPENDIX E
PLAT MAP



ERAtech
Environmental, inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

TITLE:

PLAT MAP

PROJECT:

95-1685

DATE:

7/31/95

APPENDIX F
AERIAL PHOTOGRAPHS



ERAtech
Environmental inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: 1949 AERIAL PHOTOGRAPH

Project: 95-1685

Date: 7/31/95



ERAtech
Environmental, Inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: 1968 AERIAL PHOTOGRAPH

Project: 95-1685

Date: 7/31/95



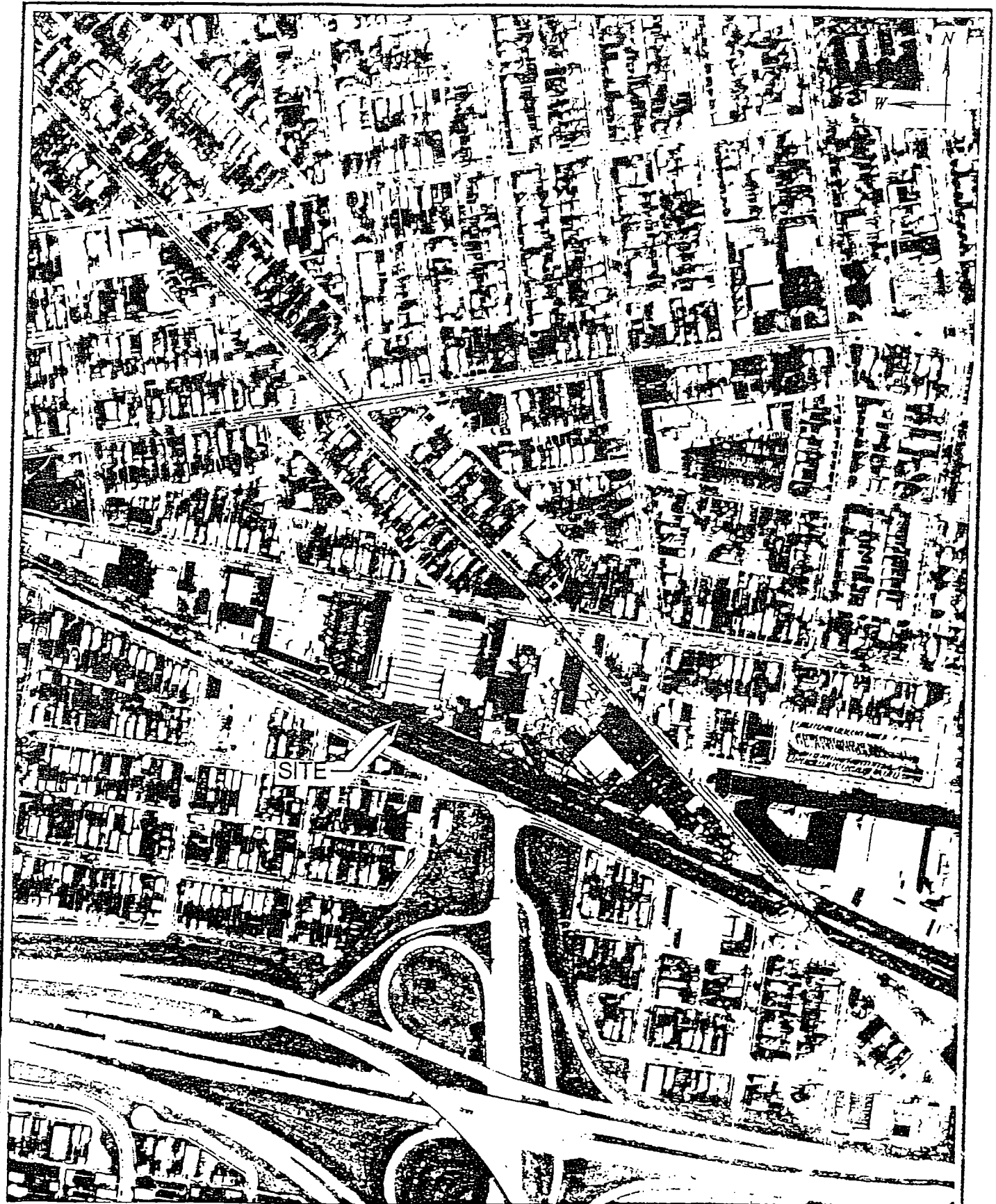
ERAtech
Environmental, Inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: 1975 AERIAL PHOTOGRAPH

Project: 95-1685

Date: 7/31/95



ERAtech
Environmental inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: 1980 AERIAL PHOTOGRAPH

Project: 95-1685

Date: 7/31/95



ERAtech
Environmental inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

Title: 1987 AERIAL PHOTOGRAPH

Project: 95-1685

Date: 7/31/95

APPENDIX G
INSPECTION PHOTOGRAPHS

448 HUFFMAN AVENUE
DAYTON, OHIO



PHOTO NO. 1 PHOTO TAKEN FROM ROOF OF BUILDING ON SUBJECT
PROPERTY, LOOKING WEST. H.J. OSTERFELD COMPANY
IS IN FOREGROUND.



PHOTO NO. 2 PHOTO TAKEN FROM ROOF OF BUILDING, LOOKING EAST
TOWARDS THE HEWITT SOAP COMPANY.

448 HUFFMAN AVENUE
DAYTON, OHIO



PHOTO NO. 3 PHOTO TAKEN FROM ROOF OF BUILDING ON SUBJECT PROPERTY, LOOKING SOUTH. STATE ROUTE 35 IS IN BACKGROUND.

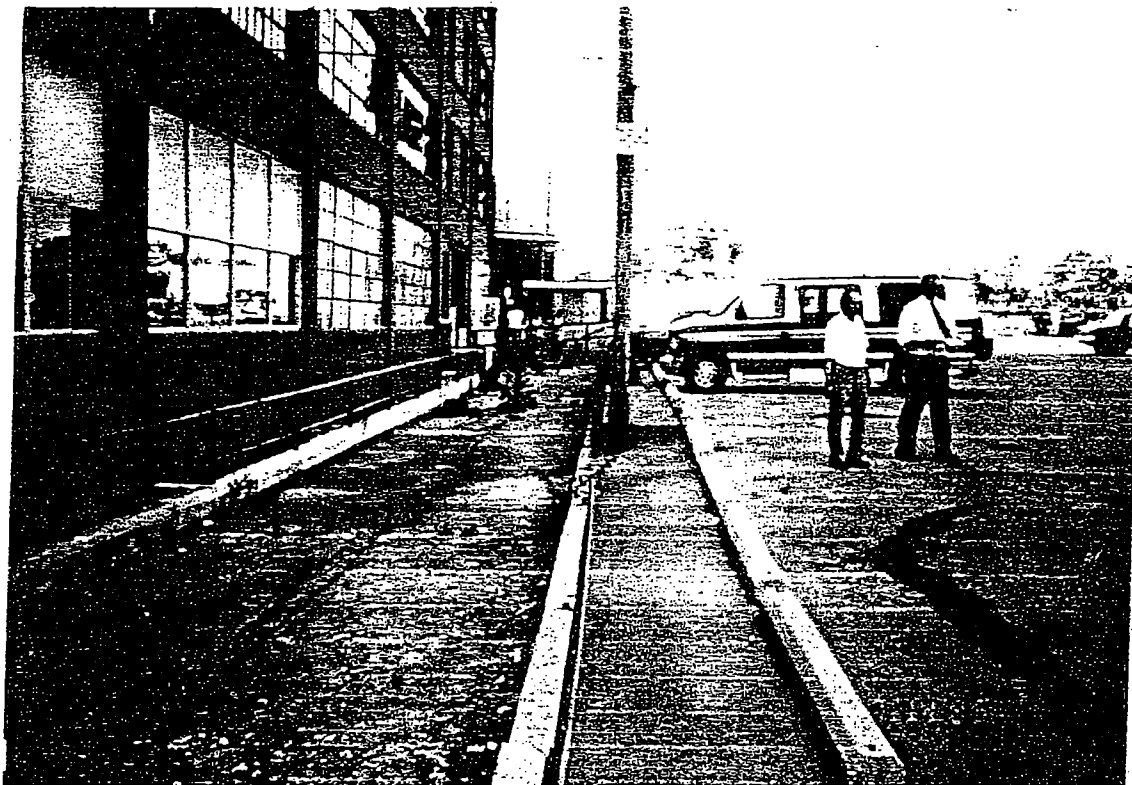


PHOTO NO. 4 PHOTO TAKEN ALONG WEST SIDE OF BUILDING LOOKING SOUTH. A PUMP ISLAND & UST WAS ONCE LOCATED IN THIS AREA

448 HUFFMAN AVENUE
DAYTON, OHIO

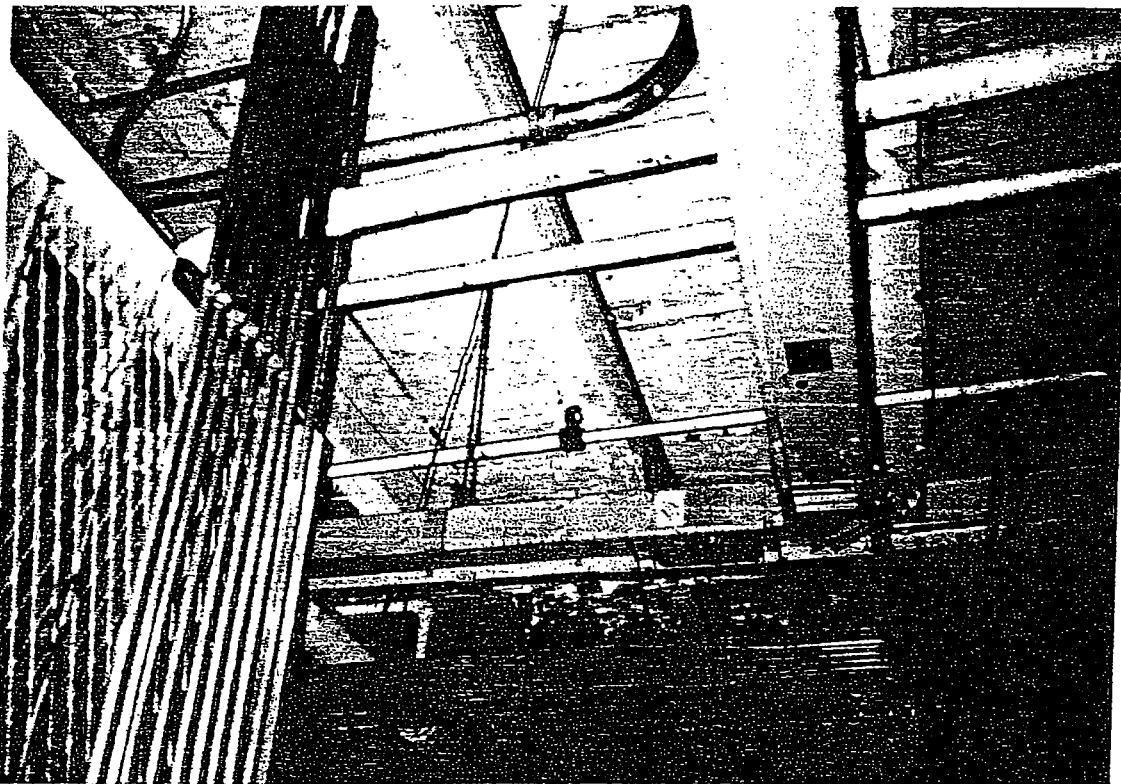


PHOTO NO. 5 PHOTO TAKEN OF PEELING PAINT ON WOODEN CEILING,
INSIDE BUILDING.

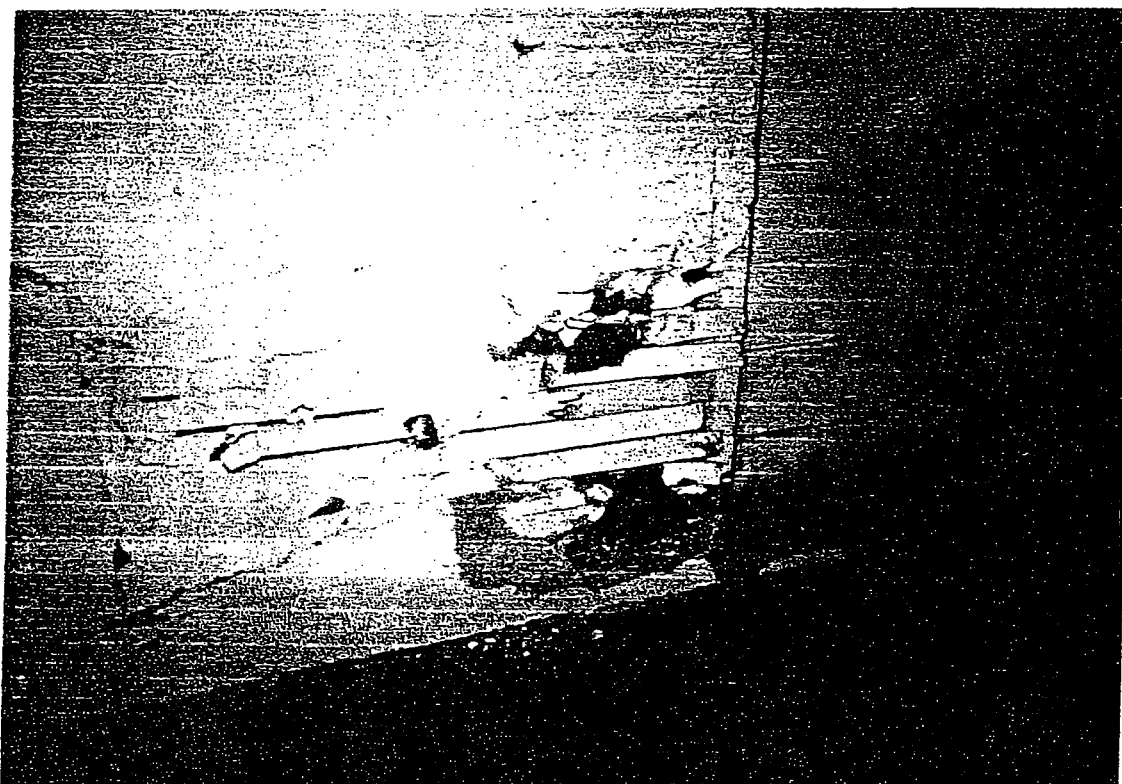


PHOTO NO. 6 DAMAGED PLASTER WALL ON SECOND FLOOR OF
BUILDING.

448 HUFFMAN AVENUE
DAYTON, OHIO

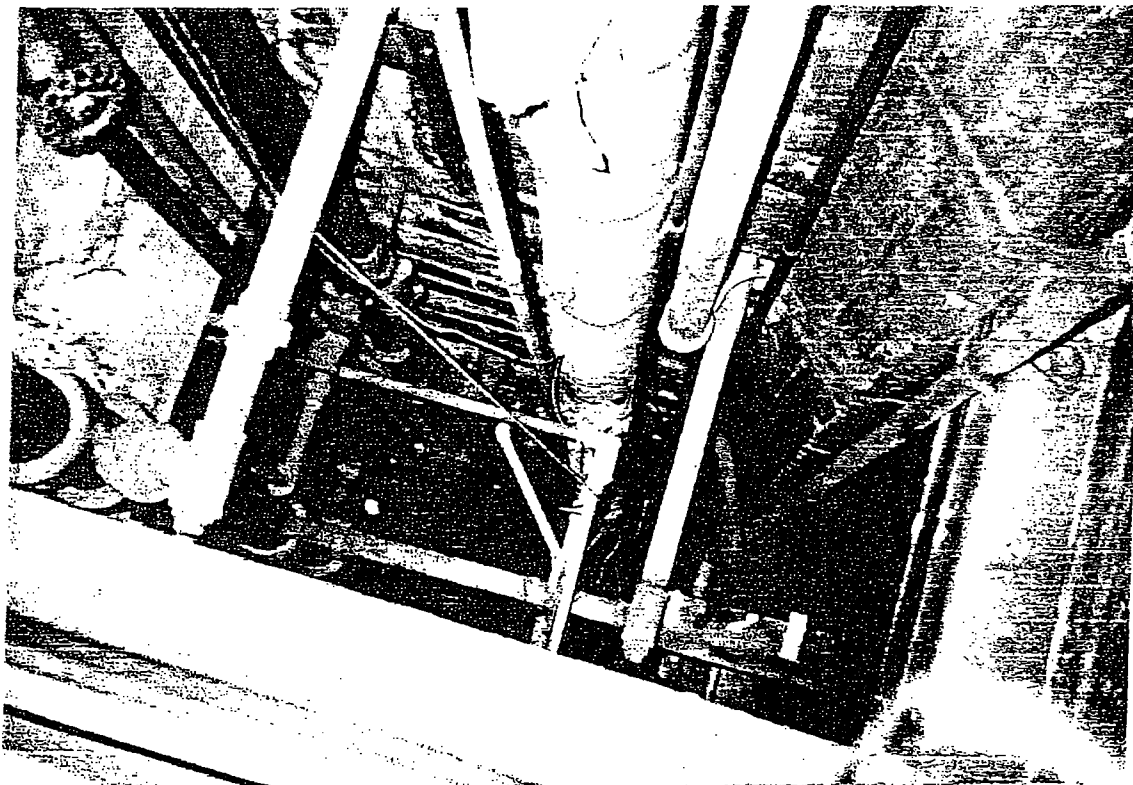
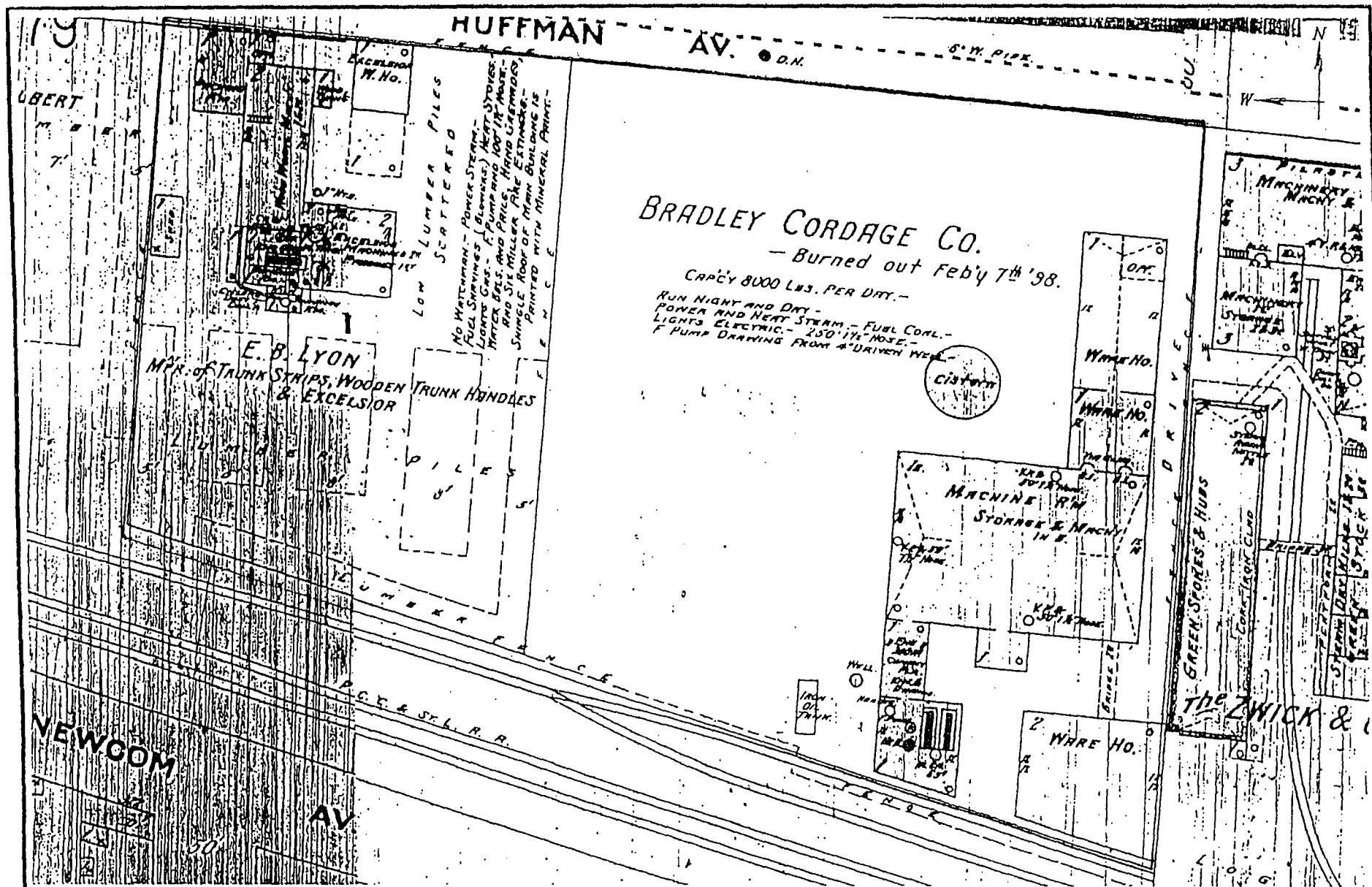


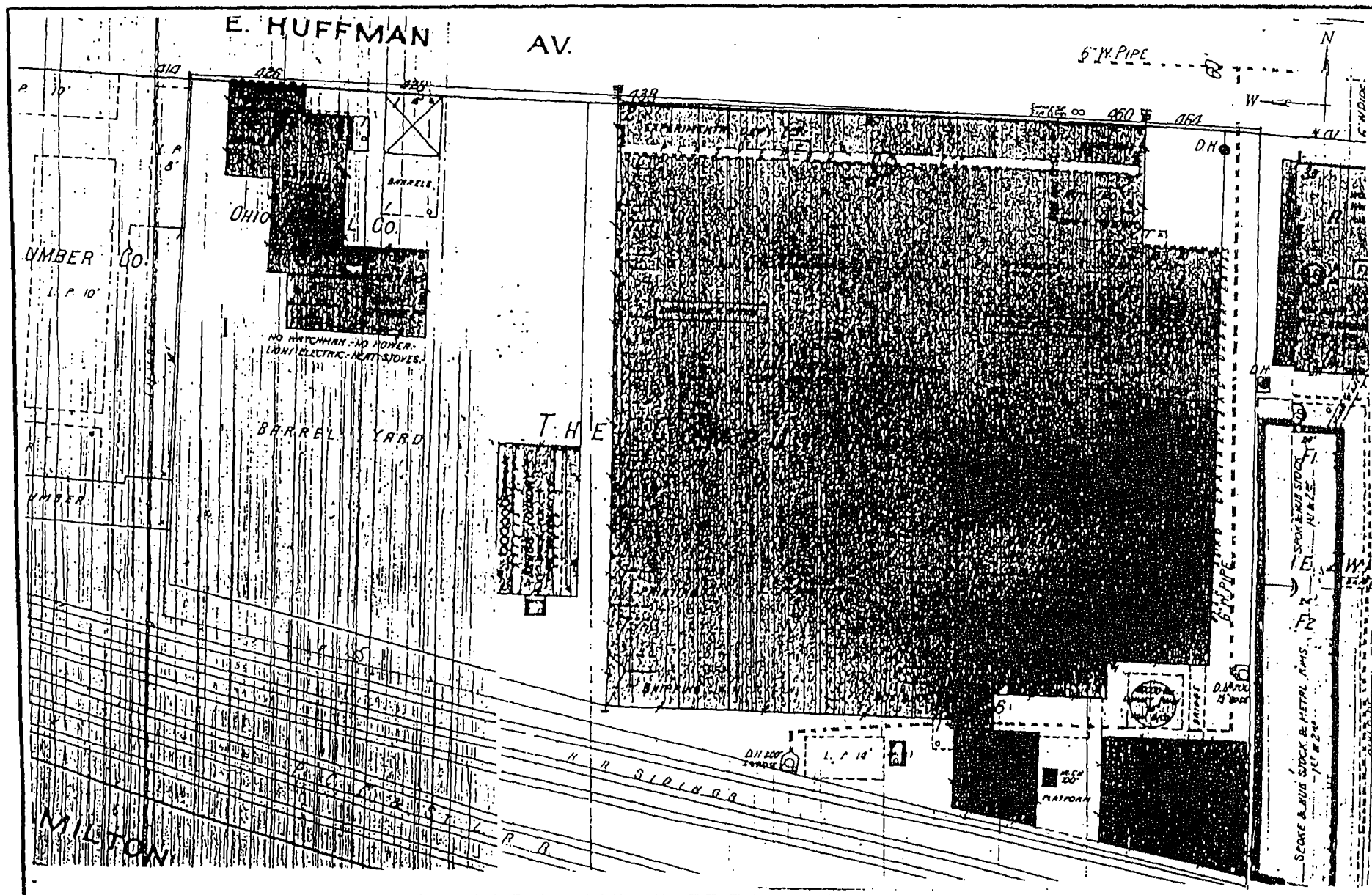
PHOTO NO. 7 PHOTO TAKEN LOOKING DOWN PIPE SHAFT AT
POTENTIAL ASBESTOS-CONTAINING PIPE INSULATION.



PHOTO NO. 8 DRYWALL ENCLOSURE BELOW POTENTIAL ASBESTOS-
CONTAINING PLASTER CEILING

APPENDIX H
SANBORN FIRE INSURANCE RATE MAP





ERAtech
Environmental, inc.

P.O. Box 250
Dayton, Ohio 45449
(513) 859-8998

TITLE:

SANBORN FIRE INSURANCE MAP CIRCA 1918

PROJECT:

95-1685

DATE:

7/31/95

APPENDIX I
OEPA FILE SEARCH DOCUMENTS

Ohio EPA

JUN 13 1985

June 11, 1985

Hobart Brothers
600 W. Main Street
Troy, Ohio 45374

Dear Concerned Party:

Ohio EPA has completed the enclosed preliminary assessment as part of our ongoing process to identify and remedy hazardous materials problems in Ohio. We are providing you with a copy of this information because of your identified owner and/or operator status.

Ohio EPA will ultimately screen (or "preliminarily assess") over 800 sites included on U.S. EPA's Emergency and Remedial Response Inventory System (ERRIS) list of 15,000+ sites nationwide. This screening is based upon readily available information, and is used to prioritize sites for additional investigation as outlined in the National Contingency Plan. (See 40 CFR Part 300) The Unregulated Sites staff conduct additional activities based upon the priority assigned in the preliminary assessment (none, low, medium, high). A site inspection with sampling sufficient to characterize the site may follow the preliminary assessment. Actions subsequent to the site inspection - if warranted - include Superfund listing and remedial actions.

The preliminary assessments are put in our files when they are completed and sent to U.S. EPA. We expect that an upcoming public status update may increase interest in these documents. Consequently we are giving you this information to better enable you to address any possible inquiries from the public. We welcome any additional information or comments and ask that you contact the Unregulated Sites staff at the following offices:

Central	Columbus	614/462-6733 or 462-8934
Northeast	Twinsburg	216/425-9171
Southwest	Dayton	513/461-4670
Northwest	Bowling Green	419/352-8461
Southeast	Logan	614/385-8501

You might also wish to contact our Public Interest Center at 1-614-466-8508.

Sincerely,



Steven H. White, Chief
Division of Solid & Hazardous Waste Management

cc: SWDO

Ohio EPA

Re: Preliminary Assessment for
the Hobart Brothers

July 24, 1985

Hobart Brothers Co.
Hobart Square
Troy, Ohio 45373

Dear Sir:

We appreciate your letter regarding the above preliminary assessment (P.A.) prepared by Ohio EPA/U.S. EPA and have placed your comments or concerns in the public file.

After careful review has been made of your comments, we will send you a letter of agreement/disagreement. If corrections are necessary, we will annotate the P.A. as appropriate and send a confirming letter and modified P.A. to you. (The existing document will be noted as appropriate, e.g., erratum, addendum, etc.) Otherwise, we will inform you that the P.A. will not be revised but your comments will remain part of the file.

If you should have any questions regarding your P.A.'s current status, please do not hesitate to call me at (614) 462-8945 or Scott Shane of the Southwest District Office at (513) 449-6357 .

Sincerely,

Tina Jennings

Tina R. Jennings
Superfund & Remedial Investigation Unit
Division of Solid & Hazardous Waste Management

TRJ/maf

cc: Scott Shane, SWDO

RECEIVED
JUL 25 1985
Environmental Protection Agency
SOUTHWEST DISTRICT



WORLD HEADQUARTERS

TROY, OHIO 45374

513 335-7171

April 10, 1984

RECEIVED

APR 16 1984

Ohio EPA
Patrick H. Gorman
Southeast District Office
2195 Front Street
Logan, OH 43138

Environmental Protection Agency
SOUTHWEST DISTRICT

Dear Mr. Gorman:

I am responding to your request for information concerning the past waste disposal practices of the Dayton Plants of Hobart Corporation.

Hobart has two plant facilities in Dayton which are within 2 blocks of each other.

1. 216 South Torrence Street
2. 448 Huffman Avenue

The Torrence Street Plant was and still is an assembly facility. In July of 1982 the Huffman Avenue Plant ceased manufacturing operations and the facility was converted to a parts distribution center. The Torrence Street Plant has always had extremely small amounts of liquid materials for disposal. In 1981 (refer to Exhibit I) Les Rosell responded to Don Marshall of OEPA concerning the Industrial Waste Survey. The quantity of liquid waste from Torrence amounted to 110 gallons/year of waste 1,1,1 - trichloroethane. This type of waste and quantity would have been expected from Torrence during the time period in question, namely 1973 thru 1980. Because of the small quantity of waste generated by Torrence, the Huffman Plant would combine the Torrence waste with its own waste for disposal. As can be seen in Exhibit I, the major portion of the waste was from Huffman.

The wastes generated during the 1973-1980 time frame consisted of the following materials:

1. 1,1,1 - Trichloroethane and cutting oil from degreasing.
2. Combination of methyl ethyl ketone, xylene, and paint.
3. Stoddard solvent and cutting oil from degreasing.
4. Machine tool water based synthetic coolants contaminated with cutting oils and solvents.

All four items were combined in single drums between 1973 and 1976. In 1976 Joe Sepeck informed Hobart that he no longer was in the business to haul our type of waste and, therefore, we should find another means of disposal. At that time, we began to separate the wastes as outlined above into single drums.

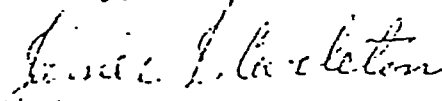
Patrick H. Gorman

April 10, 1984

Page 3

Please evaluate this information and if I can be of any further assistance, please contact me in Troy, Ohio at (513) 335-7171, extension 2751.

Sincerely,



James J. Carleton, Manager
Corporate Safety & Environmental
Protection

:sma

Attachments

cc: Jack A. VanKley, Assistant Attorney General of the State of Ohio
Don Marshall, OEPA

EPA Notification of Hazardous Waste Site

United States
Environmental Protection
Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

0HS 0000 01561

810608

OH #340

A Person Required to Notify:

Enter the name and address of the person or organization required to notify.

Name Hobart Corporation
Street 448 Huffman Avenue
City Dayton State OH Zip Code 45403

B Site Location:

Enter the common name (if known) and actual location of the site.

Name of Site Please See Attached Letter.
Street 448 HUFFMAN AV
City DAYTON County State OH Zip Code 45403

OH0071275630

C Person to Contact:

Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title) Carleton, James J. Project Engineer
Phone 513/335-7171 Hobart Corporation, Troy, OH 45374

D Dates of Waste Handling:

Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year) To (Year) Please See Attached Letter

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes.

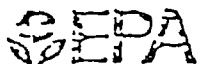
1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military/Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary/Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

F001	F002	F003
F004	F005	F006
F007	F008	F009
<u>F012</u>	<u>F018</u>	

JUN 12 1981



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
OH	040071275630

II. SITE NAME AND LOCATION

01 SITE NAME (If known, complete or approximate name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER			
Hobart Corporation		448 Huffman Ave.			
03 CITY		04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE
Dayton		OH	45403	Montgomery	113
08 COORDINATES		09 TOPO MAP QUADRANGLE			
LATITUDE E 39° 45' 31"		LONGITUDE W 84° 09' 19"			
010 DIRECTIONS TO SITE (Starting from nearest major road) Take Fifth Street going east out of Dayton and turn right onto Huffman Ave. Plant is 1/2 mile east of intersection of Huffman and 5th St.					

III. RESPONSIBLE PARTIES

01 OWNER (If known)		02 STREET (If known, complete or approximate)			
Hobart Brothers Inc.		600 W. Main (World Headquarters)			
03 CITY		04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER	07 TELEPHONE NUMBER
TROY		OH	45374	1513	335-7171
08 OPERATOR (If known)		09 STREET (If known, complete or approximate)			
James Carleton (Project Engineer)		World Headquarters			
03 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER	13 TELEPHONE NUMBER
TROY		OH	45374	1513	335-7171

01 TYPE OF OWNER (If known)

☒ A. PRIVATE ☐ B. FEDERAL ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER (Specify) ☐ G. UNKNOWN

02 OWNER OPERATOR NOTIFICATION OF FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: MONTH DAY YEAR ☒ B. UNCONTROLLED WASTE SITE (RCRA 102(a)) DATE RECEIVED: 1/12/81 ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)	
<input type="checkbox"/> YES DATE MONTH DAY YEAR	<input checked="" type="checkbox"/> NO	<input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR	<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER (Specify)
CONTRACTOR NAME(S):			

02 SITE STATUS (If known)	03 YEARS OF OPERATION
<input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	1960 1982 <input type="checkbox"/> UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

SD/VENTS (TOXIC/FLAMMABLE/EXPLOSIVE/CORROSIVE)

SLUDGE (TOXIC/FLAMMABLE)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Groundwater (Population/Environment)

Fire/Explosion (Population)

Vapor Release (Population)

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one) (If high or medium or check all, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Remedial)

☐ A. HIGH ☐ B. MEDIUM ☐ C. LOW ☐ D. NONE

01 INFORMATION AVAILABLE FROM		02 OF (Agency, Organization)		03 TELEPHONE NUMBER	
CONTACT		OEPA		1513 449-1357	
04 PERSON RESPONSIBLE FOR ASSESSMENT		05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Scott Shane		AEON		1513 449-1357	4/10/85



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
OH 040071275830

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES (Check all that apply) <input type="checkbox"/> A SOLID <input type="checkbox"/> B POWDER, FINES <input checked="" type="checkbox"/> C SLUDGE <input type="checkbox"/> D OTHER <input type="checkbox"/> E SLURRY <input checked="" type="checkbox"/> F LIQUID <input type="checkbox"/> G GAS	02 WASTE QUANTITY AT SITE (Measure in whole numbers) TONS <u>N/A</u> CUBIC YARDS <u>N/A</u> NO. OF DRUMS <u>N/A</u>	03 WASTE CHARACTERISTICS (Check all that apply) <input checked="" type="checkbox"/> A TOXIC <input checked="" type="checkbox"/> B CORROSIVE <input type="checkbox"/> C RADIOACTIVE <input type="checkbox"/> D PERSISTENT <input type="checkbox"/> E SOLUBLE <input type="checkbox"/> F INFECTIOUS <input checked="" type="checkbox"/> G FLAMMABLE <input type="checkbox"/> H IGNITABLE <input type="checkbox"/> I HIGHLY VOLATILE <input checked="" type="checkbox"/> J EXPLOSIVE <input type="checkbox"/> K REACTIVE <input type="checkbox"/> L INCOMPATIBLE <input type="checkbox"/> M NOT APPLICABLE
--	---	--

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SU	SLUDGE	N/A	N/A	Metals extracted from Rust Sludge
OLW	OLY WASTE			
SOL	SOLVENTS	110	gal/year	From both Torrence and Keftman St.
PSO	PESTOCES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES (List all substances by name, CAS number, and CAS number)

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION
Sol	1,1,1 Trichloroethane	71-55-6	Reclaim	N/A	N/A
Sol	Stannard Solvent	8052-41-3	Reclaim	N/A	N/A
Sol	methyl ethyl ketone	78-93-3	Reclaim	N/A	N/A
Sol	xylene	1330-20-7	Reclaim	N/A	N/A
Sol	Paint Thinner	N/A	Reclaim	N/A	N/A
Slu	Electroless Copper	7440-50-8	Reclaim	N/A	mg/l
Slu	Arsenic	7440-38-2	Reclaim	<.004	mg/l
Slu	Barium	542-62-1	"	.058	mg/l
Slu	Cadmium	7440-43-9	"	.012	"
Slu	LEAD	7439-92-1	"	.010	"
Slu	Mercury	7439-97-6	"	.004	"
Slu	Nickel	7440-02-0	"	.010	"
Slu	Selenium	7782-49-2	"	.005	"
Slu	Silver	7440-22-4	"	.010	"
Slu	Chromium	7440-47-3	"	.020	"
Slu	Aluminum	7429-90-5	"	N/A	N/A
Sol	Chromium	N/A	"	.014	mg/l

V. FEEDSTOCKS (List all feedstocks by name, CAS number, and CAS number)

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS	N/A		FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION (List all sources of information, e.g., MSDS, local, state, federal reports)

NOTIS, OEPA FILES (Hazardous section), Jim Carleton from Hobart (Telephone call),
Files from Hobart, Condensed Chemical Dictionary (10th edition), NIOSH



WORLD HEADQUARTERS

TROY, OHIO 45374

PLEASE REPLY TO

P.O. BOX 1690
DAYTON, OHIO 45401

June 1, 1981

To: J. J. Carleton

From: L. P. Rosell

Subject: Superfund Notification

In reply to your memo of May 13, 1981, the EPA identification number for Torrence Street is D004237434. We have not received a number for Huffman Avenue.

The major portion of our waste, in the past, has been F002, 1,1,1 Chloroethane, and F005 Paint Thinner.

Our past records of disposal are quite sketchy, but we do show between June 4, 1973, and July 5, 1976, having averaged about 15 drums of liquid waste per month. These were hauled away by Emery Jos. Sepeck of 4330 Springfield Pk., Dayton, Ohio. They were disposed of at a private (then) turned public landfill in Marietta, Ohio. The vast majority of this waste was water in the form of machine coolant.

Since that time, Systems Technology of Xenia, Ohio, has picked up and reclaimed our waste. More recently Clark Oil Co. of Dayton has picked it up and reclaimed it.

A recent check of quantities indicates that we generate about 1 drum per month, each of Trichlor, and Paint Solvent, and 2 drums per month of a mixture of Stoddard Solvent and Cutting Oil.

It is reasonable to assume that since our production was higher in the past, that we probably generated more waste in the past.

Let me know if you need further information.

A handwritten signature in cursive script, appearing to read "L. P. Rosell".

L. P. Rosell
Manager, Facilities Engineering

WASTE VENDORS AND AMOUNTS

1.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	1,650 gal.	\$ 183.81
	Clark Oil	9/17/79	Solvent Waste Oil + H ₂ O	1,650 gal.	-
	Clark Oil	5/2/80	Solvent Waste Oil + H ₂ O	1,000 gal.	250.00
	Clark Oil	8/25/80	Solvent Waste Oil + H ₂ O	1,425 gal.	356.20
	Clark Oil	11/25/80	Stoddard Solvent Waste Oil		62.95
	Clark Oil	1/30/81	Stoddard Solvent Waste Oil	850 gal.	44.20
	Clark Oil	6/11/81	Stoddard Solvent Waste Oil	611 gal.	97.76

- All oils reclaimed and resold -

2.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Environmental	8/14/81	Stoddard Solvent	191 gal.	\$ 353.35
	Processing	10/19/81	Stoddard Solvent	220 gal.	407.00
	Services	1/18/82	Paint Thinner	148 gal.	273.00
		4/15/82	Stoddard Solvent	495 gal.	915.75
		8/26/82	Stoddard Solvent	275 gal.	508.75

- All solvents reclaimed and resold -

3.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Solvent Resource	4/14/81	1,1,1 Trichloroethane	275 gal.	\$ -
	Recovery	4/14/81	Waste Paint Thinner	110 gal.	-
		8/7/81	Reconditioned Thinner	165 gal.	387.75

- All solvent and thinners reclaimed and resold -

4.	TRICIL	DATE	DESCRIPTION	AMOUNT	COST
	Environmental	12/17/76	1,1,1 Trichloroethane	220 gal.	\$ 20.00
	Services, Inc.	12/23/76	Waste	660 gal.	792.00
		1/4/77	1,1,1 Trichloroethane	440 gal.	572.00
		1/4/77	Waste	660 gal.	110.00
		4/1/77	Waste Oil & Stoddard Solvent	3,135 gal.	285.00
	Systech Liquid	6/23/77	Waste Oil & Stoddard Solvent	2,530 gal.	230.00
	Treatment Corp	9/9/77	1,1,1 Trichloroethane	2,310 gal.	210.00
		1/1/78	Waste	2,200 gal.	200.00
		5/19/78	1,1,1 Trichloroethane/Oil Stoddard	2,750 gal.	250.00
		8/13/81	Waste Solvents/Oil/Water	3,080 gal.	1,680.00
		8/17/81	Electroless Copper/Synthetic Coolant	1,155 gal.	630.00
			Electroless Copper		

- Solvents reclaimed and sold back to Hobart -

5.	COMPANY	DATE	DESCRIPTION	AMOUNT	COST
	Emery Joseph	3/17/76	Solvents/Oil/Water	550 gal.	\$ 50.00
	Sepeck	7/19/76	Solvents/Oil/Water	770 gal.	70.00
	THIS WASTE WAS HAULED TO LOCAL LANDFILL.				

SUMMARY OF WASTES FROM 3/17/76 THRU 10/19/81

SEQ.	RECLAIMER/HAULER	DATE	DESCRIPTION	AMOUNT	COST
1	Emery Joseph Sepeck	3/17/76	Waste Solvents/Oil/Water	-550 gal.	\$ 50.00
2	Emery Joseph Sepeck	7/19/76	Waste Solvents/Oil/Water	-770 gal.	70.00
3	Systech Liquid Treatment	12/17/76	1,1,1 Trichloroethane (Used)	-220 gal.	20.00
4	Systech Liquid Treatment	12/23/76	1,1,1 Trichloroethane (Used)	-660 gal.	792.00
5	Systech Liquid Treatment	1/4/77	1,1,1 Trichloroethane (Used)	-440 gal.	572.00
6	Systech Liquid Treatment	1/4/77	Oil/Stoddard Solvent Waste	-660 gal.	110.00
7	Systech Liquid Treatment	4/1/77	Oil/Stoddard Solvent Waste	-3,135 gal.	285.00
8	Systech Liquid Treatment	6/23/77	1,1,1 Trichloroethane Waste	-2,530 gal.	230.00
9	Systech Liquid Treatment	9/9/77	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,310 gal.	210.00
10	Systech Liquid Treatment	1/1/78	Stoddard Solvent/Oil 1,1,1 Trichloroethane Waste	2,200 gal.	200.00
11	Systech Liquid Treatment	5/19/78	1,1,1 Trichloroethane Stoddard Solvent/Oil/Water	-2,750 gal.	250.00
12	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	183.81
13	Clark Oil Company	9/17/79	Stoddard Solvent Waste Oil and Water	1,650 gal.	-
14	Clark Oil Company	5/2/80	Stoddard Solvent Waste Oil and Water	-1,000 gal.	250.00
15	Clark Oil Company	8/25/80	Stoddard Solvent Waste Oil and Water	1,425 gal.	356.20
16	Clark Oil Company	11/25/80	Waste Oil/Stoddard Solvent		62.95
17	Clark Oil Company	1/30/81	Waste Oil/Stoddard Solvent	-850 gal.	44.20
18	Solvent Resource Recovery	4/14/81	1,1,1 Trichloroethane Waste	-275 gal.	
19	Solvent Resource Recovery	4/14/81	Paint Thinner Waste	-110 gal.	
20	Clark Oil Company	6/11/81	Stoddard Solvent/Spdle. Oils	-611 gal.	97.76
21	Solvent Resource Recovery	8/7/81	Paint Thinner Waste	-165 gal.	387.75
	TriCil Environmental	8/13/81	Electroless Copper and Synthetic Coolant	3,080 gal.	1,680.00
23	Environmental Processing	8/14/81	Stoddard Solvent	-191 gal.	353.55
24	Environmental Processing	10/19/81	Stoddard Solvent	-220 gal.	407.00
(1976 thru 1981)				TOTALS	27,452 gal. \$ 6,612.22

A. Company Information

1. Company Name:

Hobart Corporation

2. Company Address:

448 Huffman Avenue, Dayton, Ohio 45403

3. County in which company located:

4. Name of person responding to survey:

Montgomery

L. P. Rosell

Telephone:

254-8451

B. Description of wastes currently produced:

<u>Waste name</u>	<u>quantity generated</u>	<u>solid, sludge</u> <u>liquid, hazardous</u>	<u>on-or</u> <u>off-site</u> <u>disposal</u>	<u>method (pit,</u> <u>incinerator,</u> <u>landfill, etc.)</u>
Trash	32 Cu. Yd./Wk.	Solid	Off	Landfill
Solvent-oil	55 Gal./Mo.	Liquid	Off	Reclaim
Solvent-paint	30 Gal./Mo.	Liquid-Hazardous	Off	Reclaim
Chlorothene VG	30 Gal./Mo.	Liquid	Off	Reclaim

C. Off-site: Give haulers name and address, and site of ultimate disposal, for each of the above listed wastes.

Koogler-Suburban, 4080 Industrial Lane, Dayton, Ohio 45430	Landfill
Clark Oil Co., 300 S. West End Avenue, Dayton, Ohio 45427	Reclaim
Solvent Resources Recovery, P.O. Box 453, West Carrollton, Ohio 45449	Reclaim
" " " " " " " " " "	"

D. Closed sites: Give waste descriptions and approximate quantities for any wastes previously disposed in a now closed or inactive on-site facility. Give dates site used and closed.

NONE

E. If you were unable to answer any above questions because the information is considered confidential by your company, indicate this here and we will contact you personally.



WORLD HEADQUARTERS

DAYTON, OHIO 45374

PLEASE REPLY TO:

P. O. BOX 1690
DAYTON, OHIO 45401

June 1, 1981

To: J. J. Carleton
From: L. P. Rosell
Subject: Superfund Notification

In reply to your memo of May 13, 1981, the EPA identification number for Torrence Street is D004237434. We have not received a number for Huffman Avenue.

The major portion of our waste, in the past, has been F002, 1,1,1 Chloroethane, and F005 Paint Thinner.

Our past records of disposal are quite sketchy, but we do show between June 4, 1973, and July 5, 1976, having averaged about 15 drums of liquid waste per month. These were hauled away by Emery Jos. Sepeck of 4330 Springfield Pk., Dayton, Ohio. They were disposed of at a private (then) turned public landfill in Marietta, Ohio. The vast majority of this waste was water in the form of machine coolant.

Since that time, Systems Technology of Xenia, Ohio, has picked up and reclaimed our waste. More recently Clark Oil Co. of Dayton has picked it up and reclaimed it.

A recent check of quantities indicates that we generate about 1 drum per month, each of Trichlor; and Paint Solvent, and 2 drums per month of a mixture of Stoddard Solvent and Cutting Oil.

It is reasonable to assume that since our production was higher in the past, that we probably generated more waste in the past.

Let me know if you need further information.

L. P. Rosell
Manager, Facilities Engineering

mlm

JUN 12 1981



WORLD HEADQUARTERS

TROY, OHIO 45374

513 335-7171

May 13, 1981

TO L. Rosell
Hazardous Waste Coordinator, Dayton Scale

FROM J. J. Carleton
Corporate Hazardous Waste Coordinator

SUBJECT Superfund Notification

Copies To

F. Bazler
J. Delaney
W. E. Henson
R. Lenox
R. D. Leytze
D. Riley
File

The EPA has been charged by Congress to compile information regarding past disposal of hazardous waste. The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (commonly known as Superfund) mandates in Section 103(c) that we furnish EPA by June 9, 1981, certain information concerning our past disposal practices.

In order to comply with this request for information, I am requesting that each of you send to my attention by June 3, 1981, the below information in letter form. I will then fill in the Superfund notification form and will include with it a copy of your letter. Even though we are on the fringes of what Superfund is really after, namely abandoned sites, our compliance with the request is mandatory.

Since time is of the essence, EPA is not requiring that you painstakingly document the information submitted. This information may be based on your knowledge or reasonably available records. Your best estimates involving quantities will be satisfactory.

The following information is requested:

1. EPA ID Number
2. Waste generated at your facility be EPA Hazard Code Number. These items are found on the Notification filed in August, 1980.
3. Name and address of disposal site or sites used prior to disposal under RCRA in 1980. Indicate the type of landfill (eg. County Sanitary, Private Industrial, etc.). If a recycling facility, so indicate.
4. Dates these sites were used.
5. Estimate of yearly quantities.

Please sign your letter to me, and be sure to use company stationary. In the event that you should have any questions, please contact either myself or Dick Lenox in Troy.

A copy of this letter and a copy of your response will be part of the Superfund notification which will be filed by Facilities Engineering and signed by J. J. Carleton.

Please be prompt in your information dispatch.

JUN 12 1981

J. J. Carleton/smc


JJC/smc

Page 2

Should you desire any additional information concerning these responses, please contact Jim Carleton in Troy, OH.

Sincerely,

HOBART CORPORATION


James J. Carleton
Facilities Engineering

JJC/smc
Enc.

JUN 12 1981



WORLD HEADQUARTERS

TROY, OHIO 45374

513 335-7171

June 8, 1981

US Environmental Protection Agency
Region 5
Sites Notification
Chicago, IL 60604

Gentlemen:

Attached, please find Superfund Notification forms for the following plants located in Region 5.

- | | |
|--|---|
| 1) World Headquarters
Troy, OH 45374 | 2) 750 Lincoln Avenue
Troy, OH 45373 |
| 3) 216 S. Torrence Street
Dayton, OH 45403 | 4) 448 Huffman Avenue
Dayton, OH 45403 |
| 5) 117 East Fifth Street
Greenville, OH 45331 | 6) 945 Sater Street
Greenville, OH 45331 |
| 7) Third & Sycamore Street
Greenville, OH 45331 | 8) 920 Lafayette Road
Medina, OH 44256 |
| 9) County Road 189
West Liberty, OH 43357 | 10) Route 62 North
Hillsboro, OH 45133 |
| 11) 2815 West Roscoe Street
Chicago, IL 60618 | 12) 14th & Arnold Street
Chicago Heights |
| 13) 3232 East 40th Street
Minneapolis | |

Even though we are on the fringes of what Superfund is really after, namely abandoned sites, Hobart Corporation believes that it has an obligation to disclose the past practices of waste disposal, especially those wastes classified as hazardous under the Resource Conservation and Recovery Act of 1976.

JUN 12 1981

APPENDIX J
QUALIFICATIONS OF
ERATECH ENVIRONMENTAL, INC. PERSONNEL

STATEMENT OF QUALIFICATION

ERatech Environmental, Inc. is an environmental engineering firm located in Dayton, Ohio. ERatech's professional staff of licensed engineers, a geologist, Registered Environmental Property Assessors (REPA), Associate Environmental Property Assessors (AEPA), Certified Environmental Auditors (CEA) and environmental scientists have the technical and practical skills to provide complete multi-disciplinary environmental consulting services. The following personnel are directly involved with each project as project managers, field inspectors, regulatory specialists, report writers and quality assurance specialists.

Robert L. Kohnen, P.E. is a degreed Chemical Engineer with extensive experience in the design, construction, and operation of chemical processing facilities including material handling, systems engineering, and regulatory requirements.

Stephen J. Rau, P.E. is a degreed Mechanical Engineer experienced in the technical evaluation of facility construction, process engineering, and pollution control systems.

Gregory Schwall, P.E. is a degreed Mechanical Engineer with broad experience in environmental monitoring and analytical instrumentation.

Douglas M. Kohnen, REPA is a certified asbestos hazard abatement specialist with a bachelor's of science degree in business administration. Mr. Kohnen has over six years of project management experience with Phase I environmental site assessments, facility construction, operations and installation of pollution control equipment.

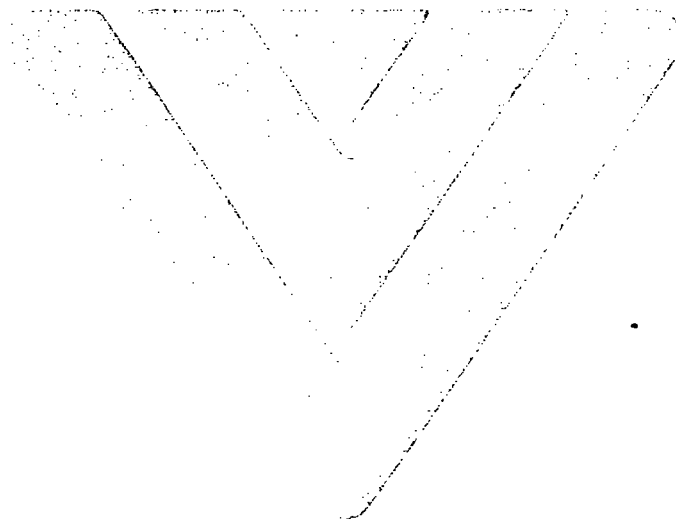
Timothy D. Farrell is a staff geologist with a bachelors degree in geology and environmental science. Mr. Farrell has over seven years experience in the environmental field, specializing in environmental sampling and analytical procedures.

Victoria V. Hathaway is a degreed biologist with a Masters in English. Ms. Hathaway has been an area supervisor for the Regional Air Pollution Control Agency (RAPCA) for thirteen years. She has extensive experience in permitting new air sources for RAPCA.

Daniel J. Smith, CEA is an industrial hygienist and holds a bachelor's of science degree in Environmental Health. Mr. Smith has over ten years experience in all phases of environmental testing and consulting, primarily in the area of occupational safety and health (OSHA) regulatory compliance.

Charles A. Kohnen, AEPA is a certified asbestos building inspector and management planner. Mr. Kohnen has experience in Asbestos Assessments, Environmental Site Assessments, and environmental and industrial hygiene sampling.

ENVIRONMENTAL SITE ASSESSMENT
FORMER HOBART FACILITY
DAYTON, OHIO
ATEC PROJECT NUMBER: 22-77032



Prepared For: Roth Office Equipment Co.
108 North Jefferson St.
Dayton, Ohio 45402

ATEC® Environmental Services

A Division of ATEC Associates, Inc.
11306 Tamarco Drive
Cincinnati, Ohio 45242-2108
(513) 489-1221

Solid & Hazardous Waste Site Assessments
Remedial Design & Construction
Underground Tank Management
Asbestos Surveys & Analysis
Hydrogeologic Investigations & Monitoring
Analytical Testing / Chemistry
Industrial Hygiene / Hazard Communication
Environmental Audits & Permitting
Exploratory Drilling and Monitoring Wells

February 10, 1988

Mr. Larry Footer
Roth Office Equipment Company
108 North Jefferson Street
Dayton, Ohio 45402

RE: Preliminary Environmental
Site Assessment
Former Hobart Facility
Dayton, Ohio
ATEC Project No. 22-77032

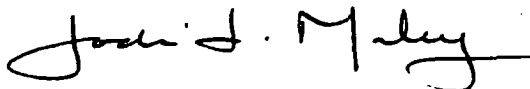
Dear Mr. Footer:

In accordance with our written proposal dated January 4, 1988, we have completed a preliminary assessment of the above referenced site in Dayton, Ohio. Please find enclosed three copies of the result of this study.

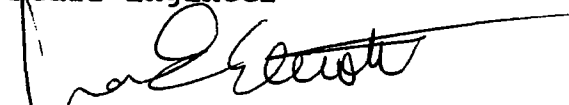
If there are any questions concerning this report or our recommendations, please, do not hesitate to call.

Very truly yours,

ATEC ENVIRONMENTAL SERVICES



Jodi L. Maley
Staff Engineer



Mark Elliott
Manager, Environmental Division

JLM/drh

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PRELIMINARY
ENVIRONMENTAL SITE ASSESSMENT

ROTH OFFICE EQUIPMENT CO.
FORMER HOBART FACILITY
216 SOUTH TORRENCE STREET
DAYTON, OHIO

ATEC PROJECT NUMBER: 22-77032

1.0 INTRODUCTION

The objective of this study was to evaluate the potential for the existence of current and future environmental liabilities being associated with the property and existing structures located at the former Hobart Manufacturing facility on South Torrence Street and Bierce Avenue in Dayton, Ohio. See Figure 1 for the site location. This assessment consisted of a determination of past and present land use practices on both this and adjacent properties, a comprehensive walking survey of the property and surrounding area, sampling and analysis for polychlorinated biphenyls (PCB's), volatile organic compounds (VOC) and heavy metals and an asbestos survey of the existing structures (reported under separate cover). In addition a soil gas survey was performed in the area where underground solvent and gasoline storage tanks had existed.

The investigations performed were designed to satisfy guidelines established by the United States Environmental Protection Agency (U.S. EPA) in the recent Superfund Amendments Reauthorization Act (SARA) of 1986. This law



SITE VICINITY MAP

ROTH OFFICE EQUIPMENT COMPANY
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 2000 ft.

FIGURE NO. 1



provides steps to be followed as potential protection against incurring environmental liabilities arising from real estate purchases.

2.0 PROPERTY WALKOVER

Prior to any other activities at the site a preliminary walkover of the property was conducted. See Figure 2 for the property plot. The tour of the facilities was guided by agents representing Roth. Present were also personnel from Woolpert Consultants. From this initial investigation several areas of potential concern were identified; the following sections provide general site descriptions and noted concerns which were identified during this survey.

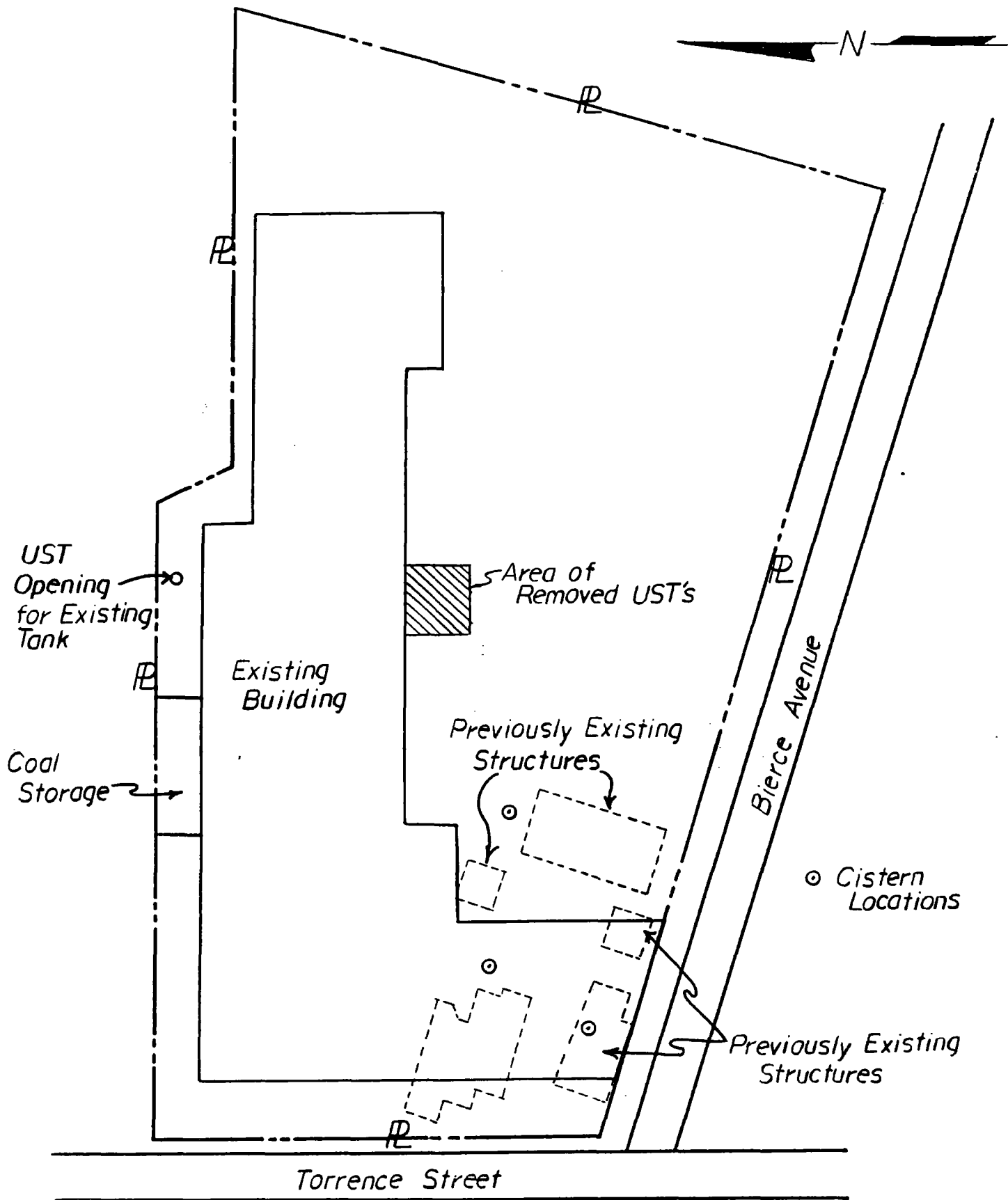
2.1 Vicinity Description

The site is located generally in a residential area of Dayton, Ohio. Single and double family homes border the plant on all sides. Some of the homes are well kept while others are in poor condition.

Within a one mile radius of the plant there are also many industrial or manufacturing facilities. The concentration of these is heaviest to the north of the facility along the Mad River where the river provided an excellent location for industry.

2.2 General Property and Facility Description

The large unoccupied structure on the property is primarily of masonry/concrete construction. The structure is a three story building that also includes a partial basement. Other portions of the property are currently paved for parking.



PROPERTY PLOT
 ROTH OFFICE EQUIPMENT COMPANY
 SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
 DAYTON, OHIO

PROJECT NO.
 22-77032

SCALE
 1 in. = 60 ft.

FIGURE NO. 2



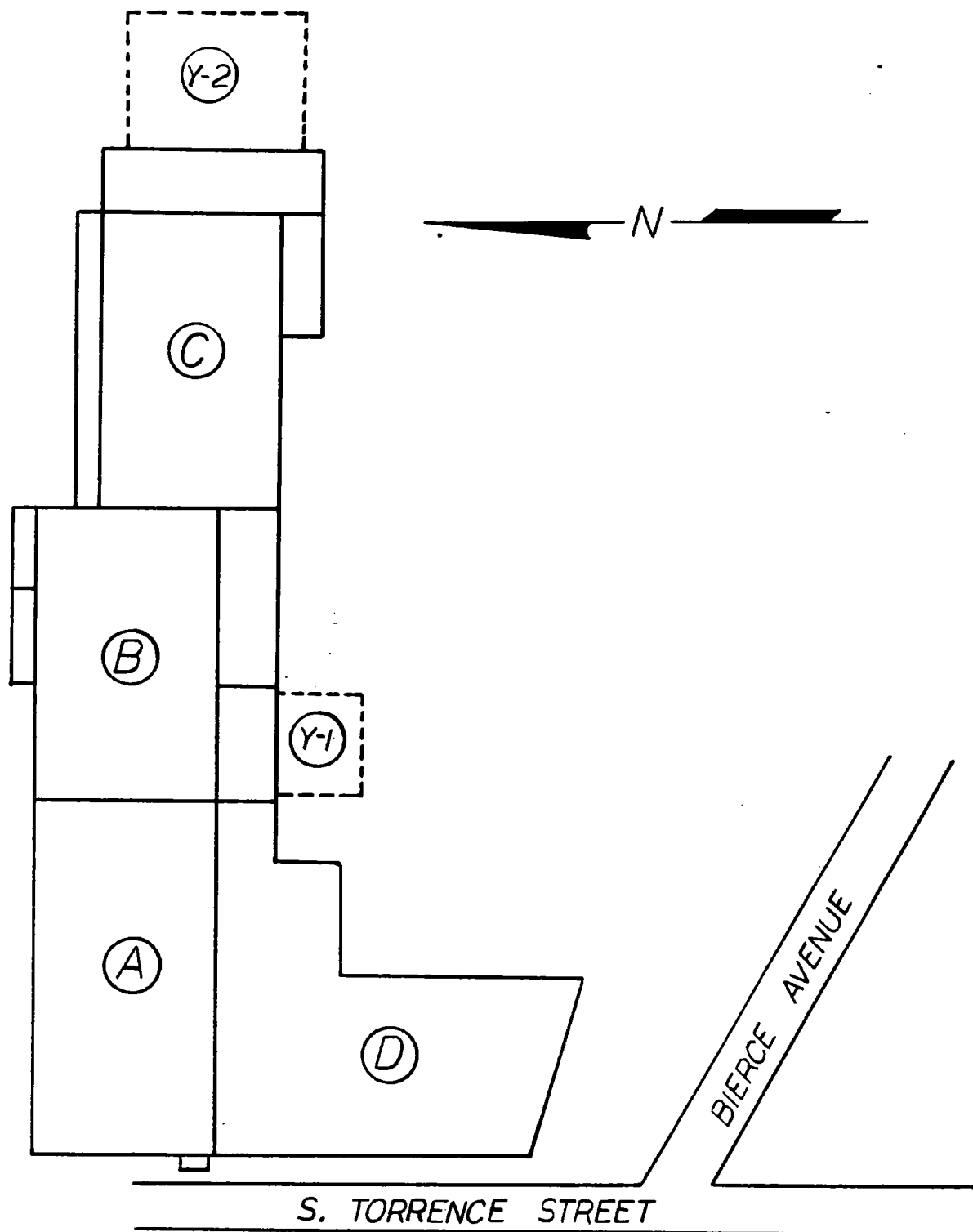
Figure 3 provides an outline of the existing facility broken into the following areas:

<u>Building</u>	<u>Constructed</u>	<u>Description</u>	<u>Size</u>
A	1916, additions 1920 and 1946	Manufacturing, ware- house, office	3-story with partial basement
B	1925, addition 1946	Manufacturing and shop	3-story with basement
C	1929	Manufacturing and storage	3-story with basement
D	1959 - 1960	Manufacturing and office	3-story with basement
Yard		Y-1 Truckwell Y-2 Truckwell	

Figures 4 through 7 illustrate the general individual floor plans of the facility, basement, first, second and third floors, respectively.

The primary use of this Hobart facility was for support of Hobart Scale manufacturing, which required a great deal of heavy machinery. The machines and manufacturing areas were located throughout the plant on all four floors.

The basement as shown on Figure 4 was utilized for a stock and storage area with machine rooms, maintenance rooms, paint and storage room and a coal storage area (used prior to Hobart's occupation). Also in the basement are the facilities utility systems including a Dayton Power and Light (DP&L) transformer vault, heating and air conditioning/ventilation equipment and a boiler room. An incinerator is also located in the basement.



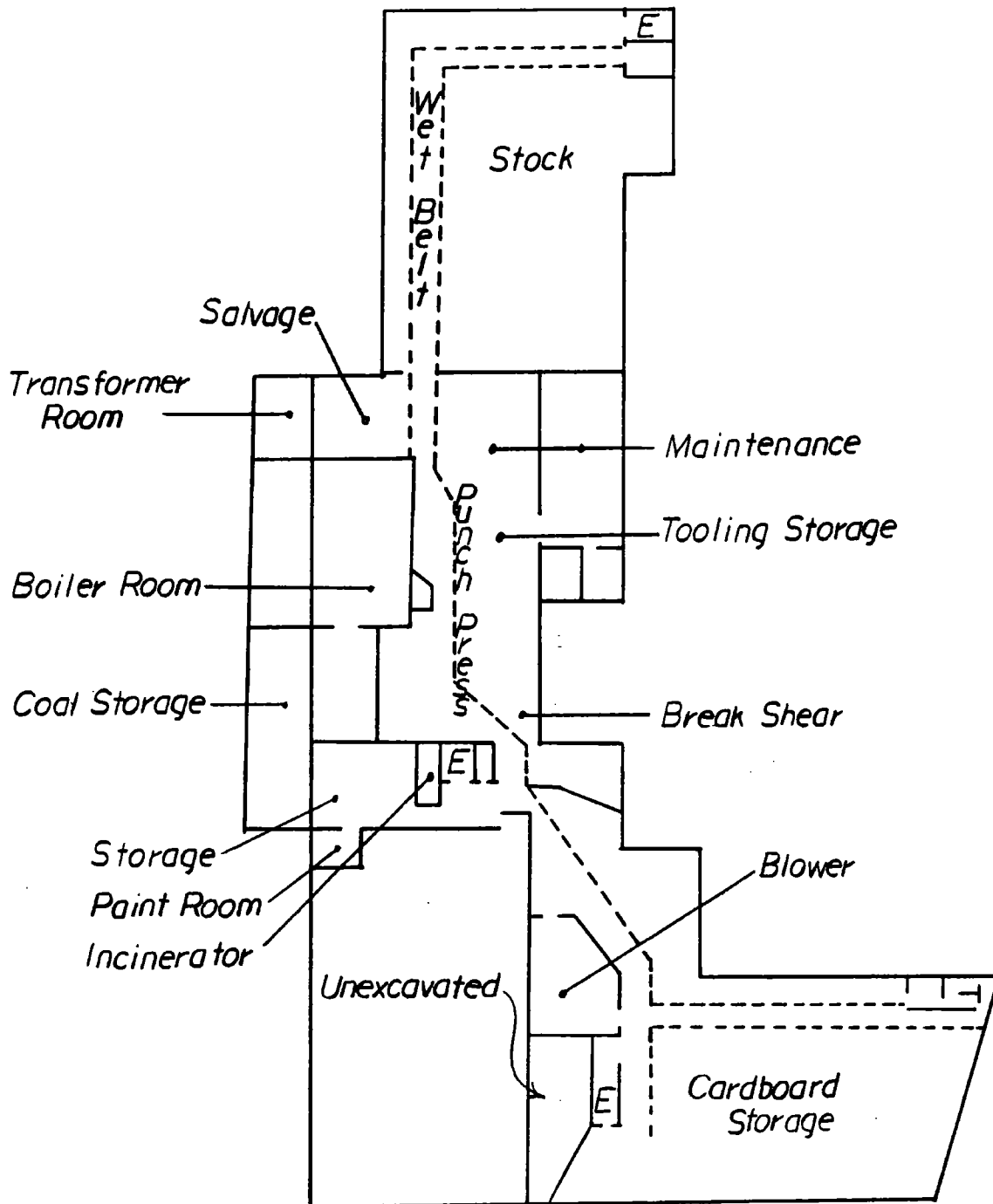
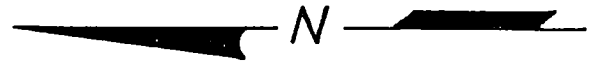
FACILITY DESCRIPTION
ROTH OFFICE EQUIPMENT COMPANY
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 60 ft.

FIGURE NO. 3





BASEMENT FLOOR PLAN

ROTH OFFICE EQUIPMENT COMPANY

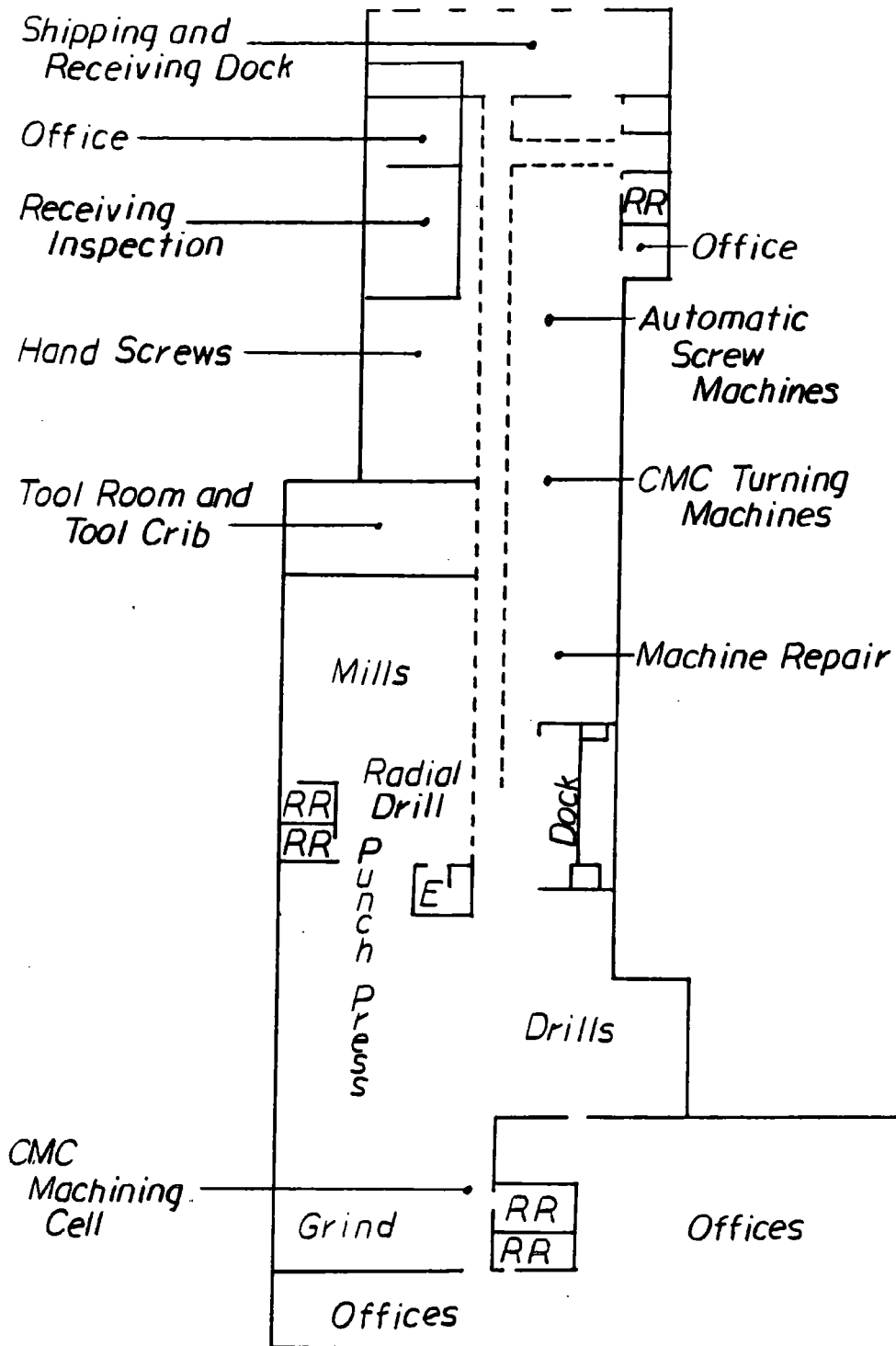
**SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO**

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft.

FIGURE NO. 4





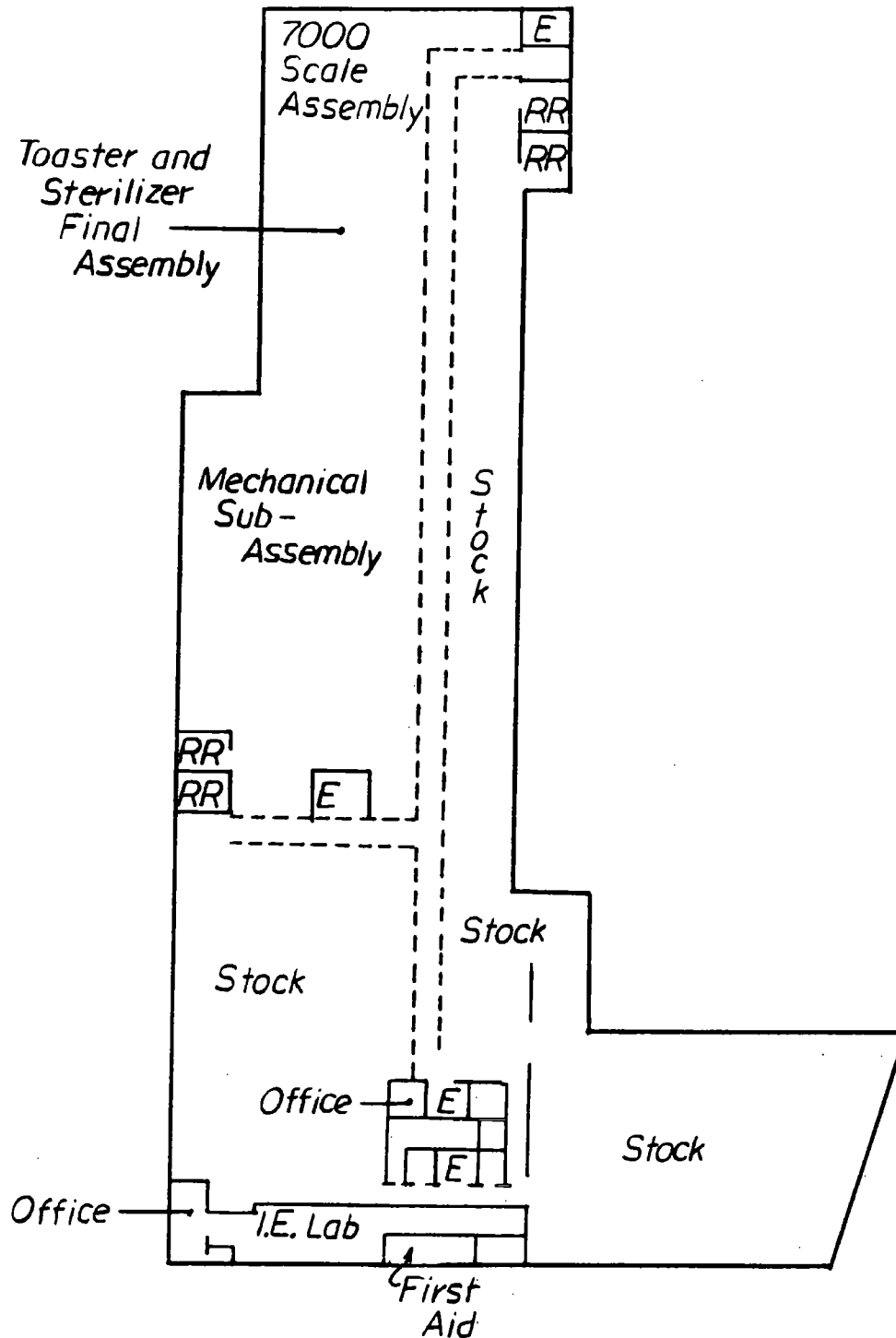
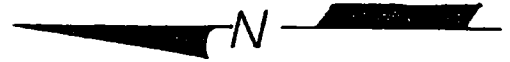
FIRST FLOOR - FLOOR PLAN
ROTH OFFICE EQUIPMENT COMPANY
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft.

FIGURE NO. 5





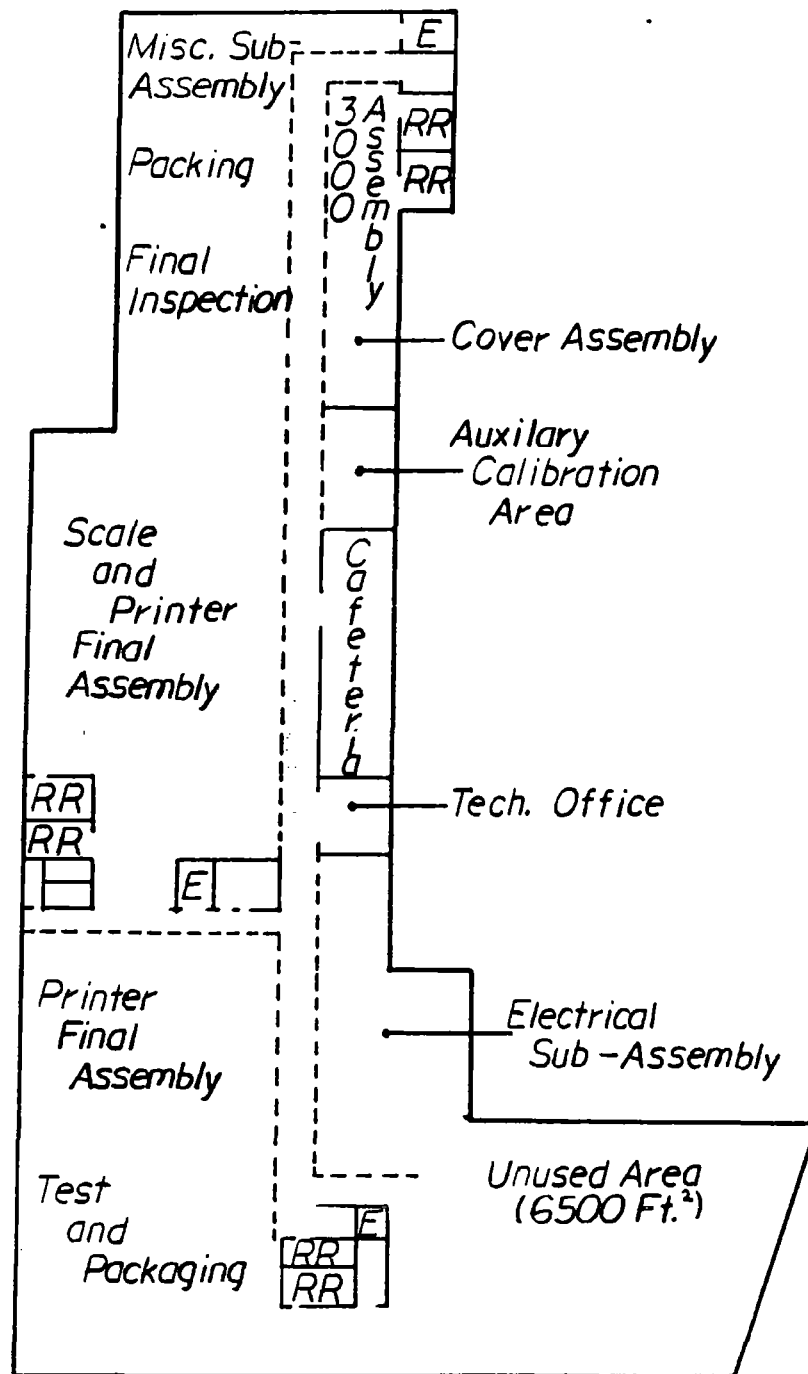
SECOND FLOOR-FLOOR PLAN
ROTH OFFICE EQUIPMENT COMPANY
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft.

FIGURE NO. 6





THIRD FLOOR-FLOOR PLAN

ROTH OFFICE EQUIPMENT COMPANY

*SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO*

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft.

FIGURE NO. 7



The first floor of the facilities, as shown on Figure 5 was utilized primarily for manufacturing. Offices were present to the west end of the building in the Building D and to a lesser degree the Building A portions of the structure. Shipping and receiving was located to the east end of the building where truckwells are located.

A good portion of the second floor appears to have been utilized for stock storage. A small laboratory was present to the west end of the facility. Assembly areas were also located on the second floor. See Figure 6.

The third floor was utilized for assembly, testing and packaging. A cafeteria was also present here. See Figure 7.

The paved areas around the Hobart Plant were utilized primarily for parking. It is not known whether any storage occurred on portions of the yards of the plant. Several manways and vent lines are located in the yard of the property associated with the basement coal storage area and the existing underground fuel storage tank (UST) or the previously existing tanks. Figure 2 depicts the locations of the current UST, and previously existing UST's.

2.3 Site Observations and Potential Concerns

The potential for the use of hydraulic fluids in machine operations at the facility containing polychlorinated biphenyls (PCB's) exists. Leakage or spills from the facilities machines onto exposed concrete flooring, floor drains, machine pads and into sumps could have caused contamination of these areas with oils. Site observations indicated many oil stained areas throughout the facility.

Other areas which may also have been exposed to PCB laden oils and grease include elevator shafts at the facility and areas surrounding transformers. This would include the transformer vault in the basement of the facility where DP&L has indicated that at least one transformer on the premises may contain PCB oils. (All transformers are reportedly to be tested by DP&L.) Three elevator shafts are present within the facility. The fuel oil tank present on the property may also be a source of PCB contaminants. This is dependent upon the type of oil historically stored here. Heavy oils such as #6 grade are often blends of many waste materials that can contain PCB's. The bottom of the tank was measured at 10.0 feet below ground and approximately 2.5 feet of product remains in the tank. The tank is reported to be approximately 10,000 gallons in capacity. This means that possibly 2,300 gallons of product remains in the tank.

To a lesser degree volatile organic compounds (VOC's) may be a potential concern in the manufacturing areas of the facilities. Solvents are often utilized in manufacturing facilities such as this for degreasing and cleaning agents. While no drums or cans labeled solvents were found on the site, solvents were reported to the OEPA to be contained in wastes generated by the facility as described later. Also, one 550 gallon UST labeled as containing solvent was noted on one of the sketches provided by the client which would further verify their utilization at the plant.

What were believed to be paint shops and/or storage areas were found to be located in the basement of the plant as indicated on Figure 4. Some paint residues were visible. If metal based paints were used, heavy metals

contamination could be a potential problem in this area. Floor sumps were found to be located in these areas and residues were present in the sumps. The sumps initially appeared to run directly to the subsurface. In addition to metals the presence of VOC contaminants from paint thinners and cleaners may exist. Rusty drum outlines were also apparent on the floor of one of these rooms.

An incinerator located in the basement has the potential for having contaminants associated with it. Contaminants are dependent upon the types of materials burned. Facility personnel reported utilization of the incinerator to include the destruction of all kinds of facility refuse. This could include oil soaked materials, paints, solvents, cans, bottles, paper products and possibly PCB's. Concerns over contaminants which may remain in residues of the incinerator if PCB's and paint were burned could include dioxins, furans and heavy metals.

Some degree of oily staining and residues were noted on floors and walls and in drains running throughout the facility. Staining of floors and materials was heaviest on the first floor of the plant where the main manufacturing area was located, and in the northwest corner of the building where grinding operations were conducted. See Figure 5 which denotes a plan of the first floor. Also in the radial drill area oil filled plug outlets in the floor were noted that also contained metal shavings. Walls and columns on the first floor show evidence of oil staining up to about 5 feet in height.

The floors of the second and third floors were somewhat oil stained although to a lesser extent than the first floor. Patches of oil are present on the second floor in

the assembly areas. What appeared to be a non-slip pathway was found in the south center of the second floor that also had areas of heavy staining. See Figure 6 which denotes these areas. Some staining was also evident on walls of this floor.

3.0 RECORD SEARCH

The early history of the use of this property is believed to be as farmland owned by private individuals until the early part of this century. As the City of Dayton grew, this area was developed into a mixed residential and industrial area. A large unoccupied warehouse, manufacturing facility is now present on the property. The oldest part of the facility in the northwest corner was built in 1916 for the Monarch Tag Company which later became Monarch Marking Incorporated (Monarch). See Figure 2 for the property plot and building location. Additional property was acquired by Monarch in 1927 from E.K. Fredenbeger Kette and Ida Fredenberger to expand the facility. An encroachment on a vacated alleyway running parallel to Bierce Avenue was permitted by an ordinance of the City of Dayton in 1928. The lots between the existing building and Bierce were purchased one by one between 1949 and 1960. Over the years many additions were added to the structure. Two frame houses occupied the three lots on which the newest addition was built. A third house was present just north of the addition. These former home sites are shown on Figure 2. No evidence of these previous structures, or any of their out buildings or associated structures, remains at this time.

The entire Monarch facility and grounds were purchased by the Hobart Manufacturing Company for use by its Dayton Scale Division in 1966. Hobart Manufacturing became Hobart International in 1985. This facility is no longer in operation although Hobart does operate other plants in the immediate area.

The Ohio Environmental Protection Agency (OEPA) was contacted to determine if this site or any nearby properties were classified as sites eligible for action under the Resource Conservation and Recovery Act (RCRA) or Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). A search of their records indicated that there are two Comprehensive Environmental Resource, Conservation and Liability Inventory System CERCLIS listed sites close to this property that have been identified by both the U.S. EPA and the OEPA as potentially having associated environmental liabilities. Both of these sites are also owned by Hobart. An inactive site at Huffman and Torrence was placed in the low priority category after a preliminary assessment by the OEPA. An active facility at Fifth and Torrence has been given a designation of no further action by the OEPA.

Files maintained by the OEPA for the subject property showed that this property was permitted as a generator of hazardous wastes under RCRA. This by definition is any person, site or location, whose act or process produces hazardous waste as defined or listed in Title 40 Code of Federal Regulations Part 261 (40 CFR 261). Being classified as a generator indicates that a facility generates more than 100 kilograms of hazardous waste in a month and stores this for less than 90 days. If storage of wastes on site goes beyond 90 days the facility is reclassified under more stringent definitions under RCRA.

No records were available through OEPA for the previous owner Monarch Marking Company. Due to the age of the facility, these operations predated the implementation of RCRA. Monarch is still in operation in Dayton.

Wastes permitted at the site are classified in 40 CFR 261 as follows:

F001 The following spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, AND F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F002 The following spent halogenated solvents: Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F003 The following spent non-halogenated solvents: Xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohexanone, and methanol; all spent solvent mixtures/blends containing, before use, only the above spent non-halogenated solvents, and, a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004 and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F005 The following spent non-halogenated solvents: Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002 or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

U186 1-Methylbutadiene (rubber)

U226 Methylchloroform (1,1,1 trichloroethane)

P025 1-(Achlorobenzoyl), 5-Methoxy, 2-Methlindal, 3-Acetic Acid (this has been delisted and is no longer a waste number in accordance with 40 CFR 261).

The Hazardous Materials Division of the Dayton Fire Department was contacted to determine if they had any record of incidents involving hazardous materials at the subject site. Since no specific date was available to check, it was not feasible to search the emergency response team dispatch files, but fire officials could not recall any complaints on record concerning the use or storage of hazardous materials at the site.

Officials of Hobart International were contacted to provide documentation of any tank removals at the site. It was confirmed that tanks in the parking lot were removed sometime in 1983 or 1984 by C & W Service, Dayton, Ohio. Efforts to contact this company were unsuccessful. It was further revealed that Hobart did not retain any of the documentation of the tank removal, but did recall that two 550 gallon petroleum tanks were removed. Hobart reported that at the time of the removal one tank contained regular gasoline and the other contained unleaded gasoline. A 10,000 gallon fuel oil tank still remains on the property. The locations of this and the two previously existing tanks are shown on Figure 2. It should be noted that from a sketch of the facility provided by the client one of the removed tanks was labeled as a solvent tank. This would tend to imply either a converted use or replacement of the former solvent tank had occurred or that records were inaccurate.

4.0 FIELD INVESTIGATIONS

Field investigations for the project involved sampling on all four floors of the facility. The primary means of sampling

was through the use of wipe samples although samples of residues, concrete chips and direct product were also obtained from the facility. Figures 8 through 11 denote the sample locations obtained in the interior of the facility by the above means. A soils-gas survey was also conducted surrounding the two previously removed UST's to preliminarily delineate contaminants remaining in the surrounding soils.

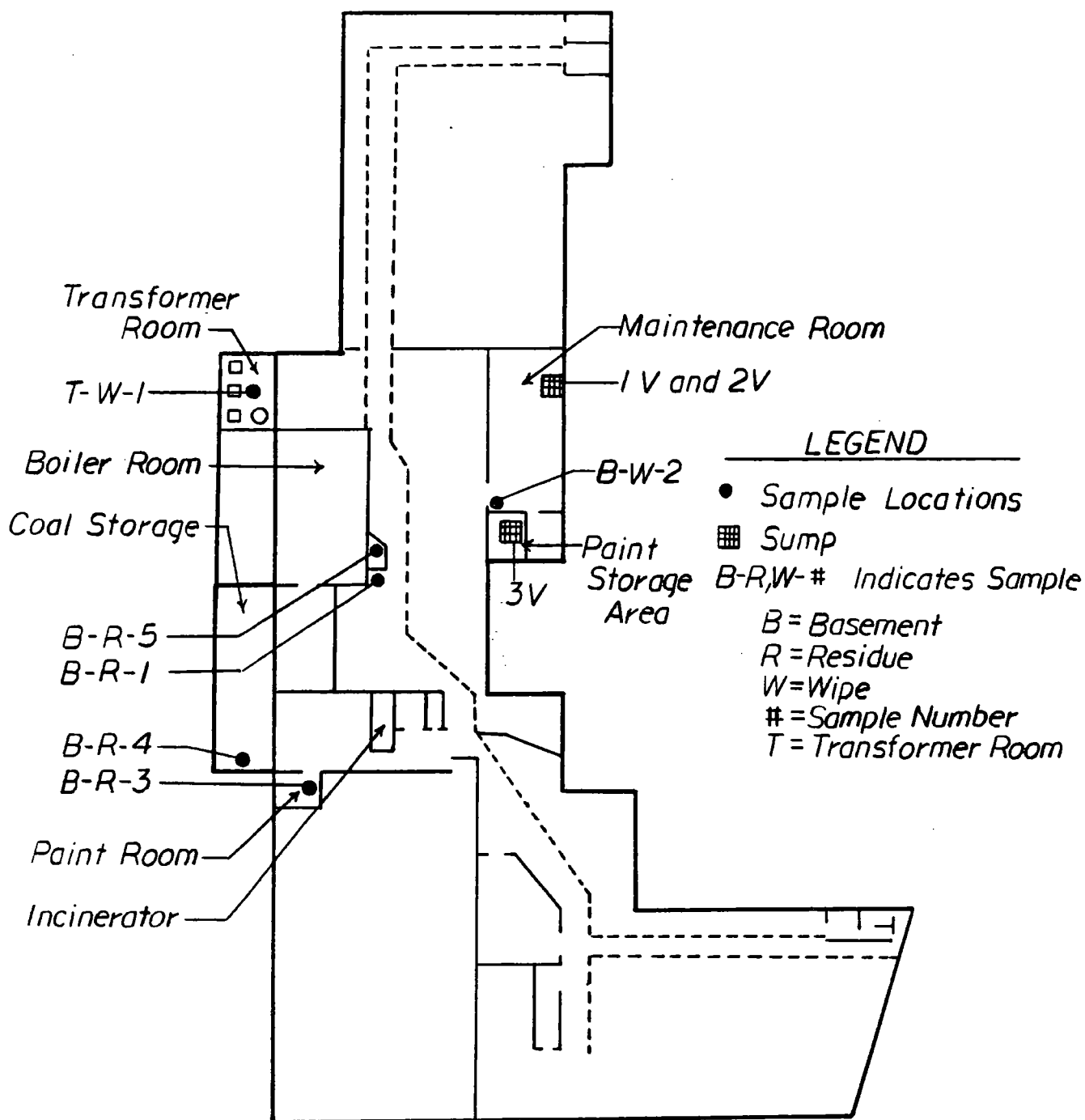
4.1 Safety and Protocol

In order to assure proper safety measures for personnel involved in investigative activities, site safety procedures were discussed with each employee prior to commencement of activities. Emphasized were characterized hazardous materials that could possibly be encountered on-site, and outlined procedures for their handling to protect the workers.

PCB's were one suspected contaminant at the Hobart plant site. Where suspected, Saran Tyvek suits and nitrile gloves and boots were worn at all times. No volatiles were suspected in levels considered detrimental to the immediate health of the worker so no respirators were worn within the facility. All personnel were however required to have respirators on site and the air was constantly checked with a photoionization detector to verify air quality.

An HNu Photoionization Detector was utilized by personnel in order to monitor the presence of total photoionizable vapors (TPV's) in parts per million (ppm) released from any volatile source for safety purposes.

This portable instrument measures total photoionizable vapors (TPV's) in the air. To accomplish this, the HNu is equipped with a small pump which continuously draws



BASEMENT SAMPLE LOCATIONS

ROTH OFFICE EQUIPMENT COMPANY

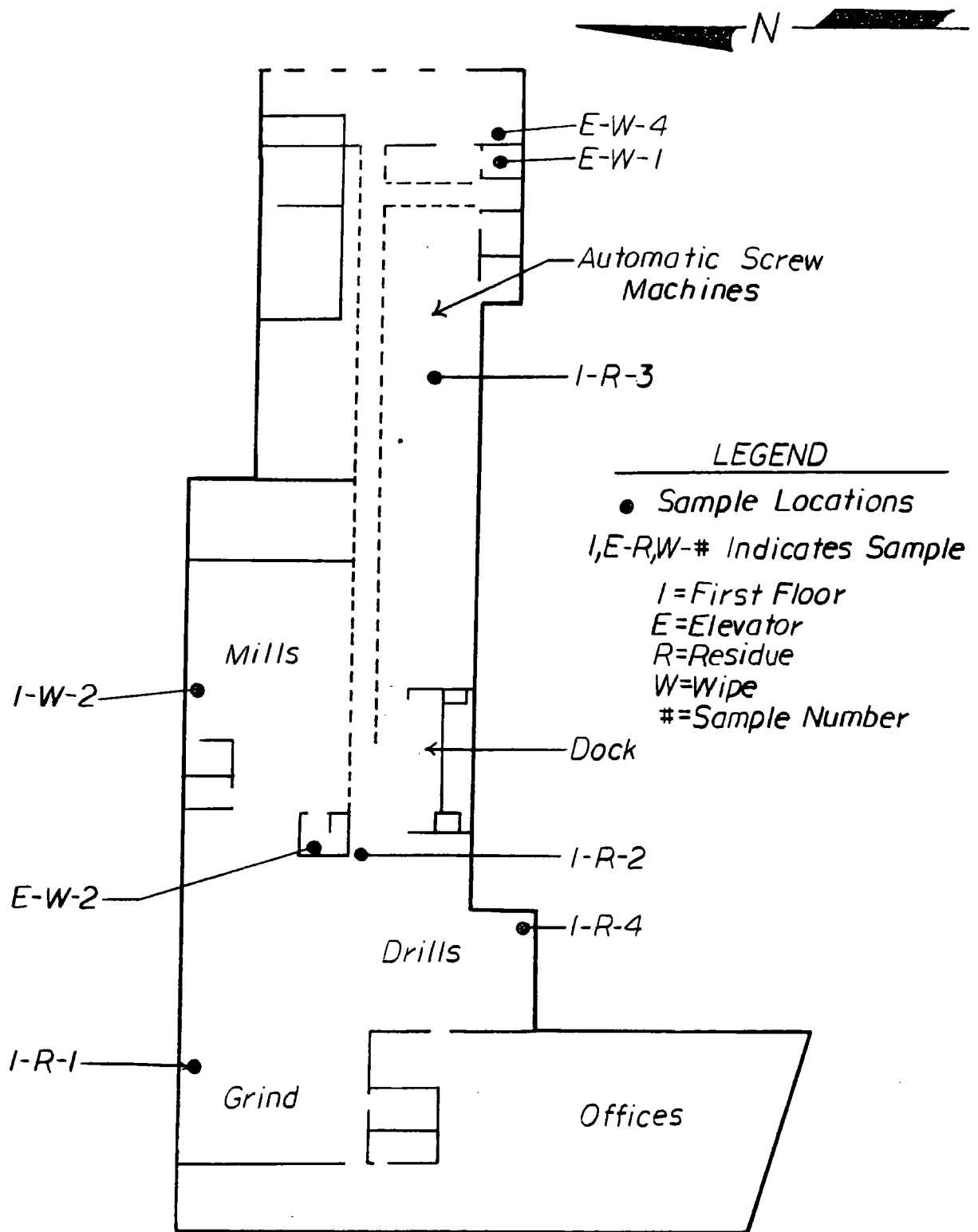
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft

FIGURE NO. 8





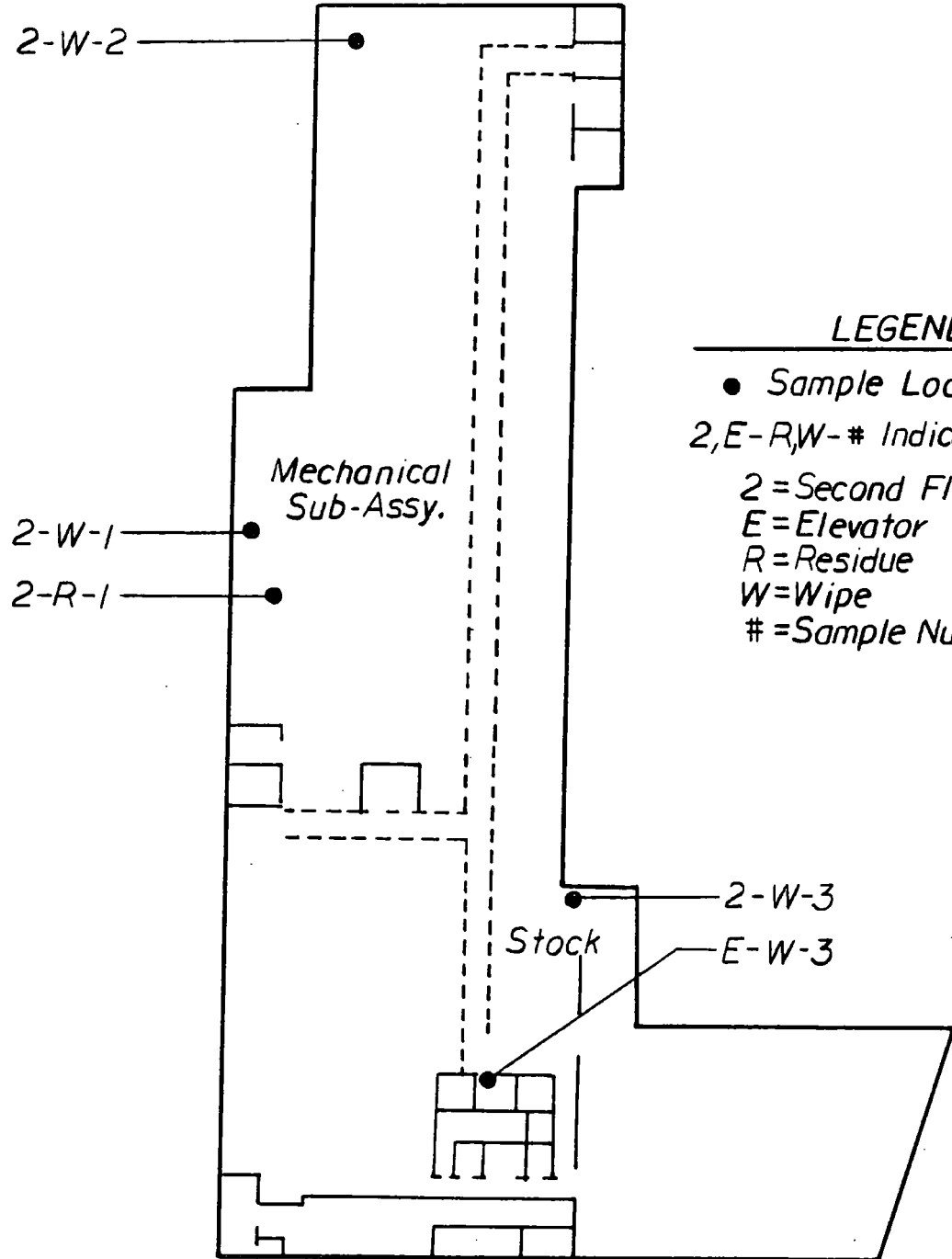
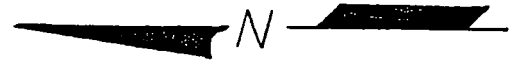
FIRST FLOOR SAMPLE LOCATIONS
 ROTH OFFICE EQUIPMENT COMPANY
 SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
 DAYTON, OHIO

PROJECT NO.
 22-77032

SCALE
 1 in. = 50 ft.

FIGURE NO. 9





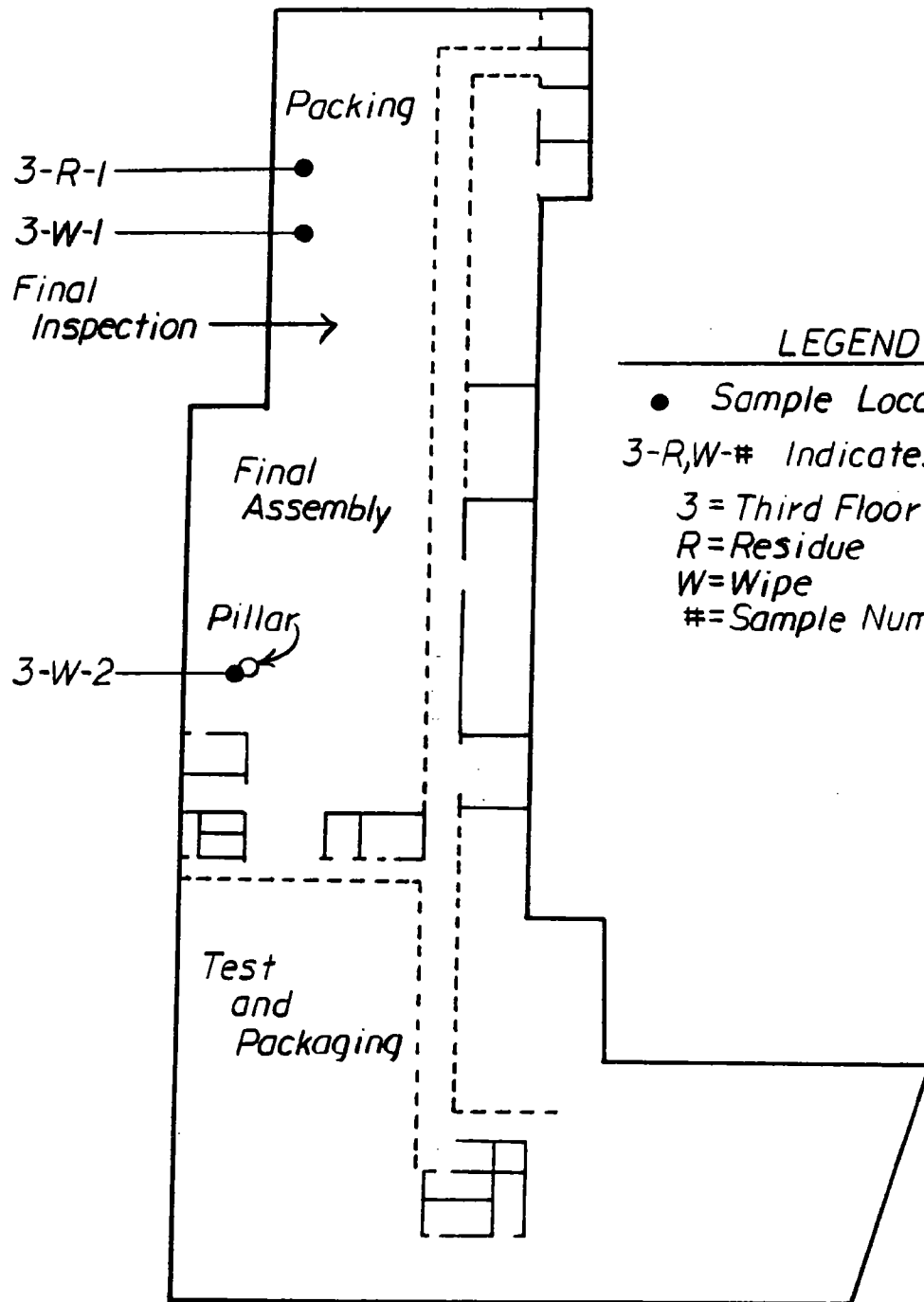
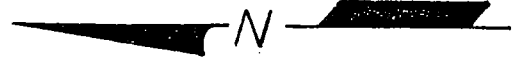
LEGEND

- Sample Locations
- 2,E-R,W-# Indicates Sample
- 2 = Second Floor
- E = Elevator
- R = Residue
- W = Wipe
- # = Sample Number

SECOND FLOOR SAMPLE LOCATIONS
ROTH OFFICE EQUIPMENT COMPANY
SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO. 22-77032
SCALE 1 in. = 50 ft.
FIGURE NO. 10





LEGEND

- Sample Locations
- 3-R,W-# Indicates Sample
- 3 = Third Floor
- R = Residue
- W = Wipe
- # = Sample Number

THIRD FLOOR SAMPLE LOCATIONS
ROTH OFFICE EQUIPMENT COMPANY

SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
DAYTON, OHIO

PROJECT NO.
22-77032

SCALE
1 in. = 50 ft.

FIGURE NO. 11



air samples into an ionization chamber which is flooded with ultraviolet light. An electric current is generated through the ionization of the vapors flowing through the chamber. This electric current is found to be proportionate to the concentration of the ionizable compounds present. The resultant value is recorded on the instruments liquid crystal diode (LCD) display in part per million (ppm).

The ultraviolet lamp in the HNu has a 10.2 electron volt (eV) energy level, therefore compounds with an energy excitation wavelength within the instruments tolerance will ionize. The majority of light permanent gases, i.e. those in ambient air, have ionization potentials exceeding 12 eV, high enough that they would not be detected by the instrument. Many organic compounds, i.e., ethanol, trichlorethylene, benzene, acetone, hexane, etc., have ionization potentials within the 10.2 eV tolerance of the instrument.

For the purpose of this investigation, the HNu was utilized only as a screening tool to determine the possible presence of photoionizable contaminants being associated with the site. For screening purposes, ATEC relies on the calibration performed on the instrument at the factory. The factory calibrates the HNu to 100 ppm isobutylene, therefore, reported values represent ppm isobutylene. The relative magnitude of the values obtained between sampling locations is considered to be of primary importance in screening for the possible presence of contamination. For safety purposes any reading of unidentified vapors in excess of 5 ppm in the breathing space would have required the utilization of respirator protection.

4.2 Interior Sampling Procedures

Sampling consisted of representative samples of concrete, residues and product; however, the primary means of sampling was by wipe samples.

All wipe samples were performed in accordance with U.S. EPA standards.

4.2.1 Wipe Samples

A standard size teflon template (10 cm x 10 cm) and 11 cm diameter Whatman 40 filter paper were utilized to obtain the wipe samples. Each filter paper was prepared at the ATEC laboratory prior to its transport to the field by saturating each filter with high grade hexane. The wiping medium was stored in sealed amber glass jars with teflon lined lids for transport to the site. Upon wiping the delineated area of the floor or wall, etc. each filter was placed back into the amber jars for shipment to the ATEC Chemistry Laboratory for analysis.

Wipe samples were obtained throughout the four levels of the facility. Samples were collected off of floors, walls, columns and machine pads, as well as inside the DP&L transformer vault in the basement of the plant. Sampling in the vault was accomplished while accompanied by DP&L personnel.

Forceps and templates were decontaminated between sample locations with high grade hexane to protect against cross contamination.

4.2.2 Concrete and Residue Samples

Concrete chips from the floor at several locations in the plant were collected. These were collected from damaged floor areas and placed in amber jars with teflon lined lids for shipment to the ATEC Chemistry Laboratory. Samples were obtained through the use of a small hammer and chisel.

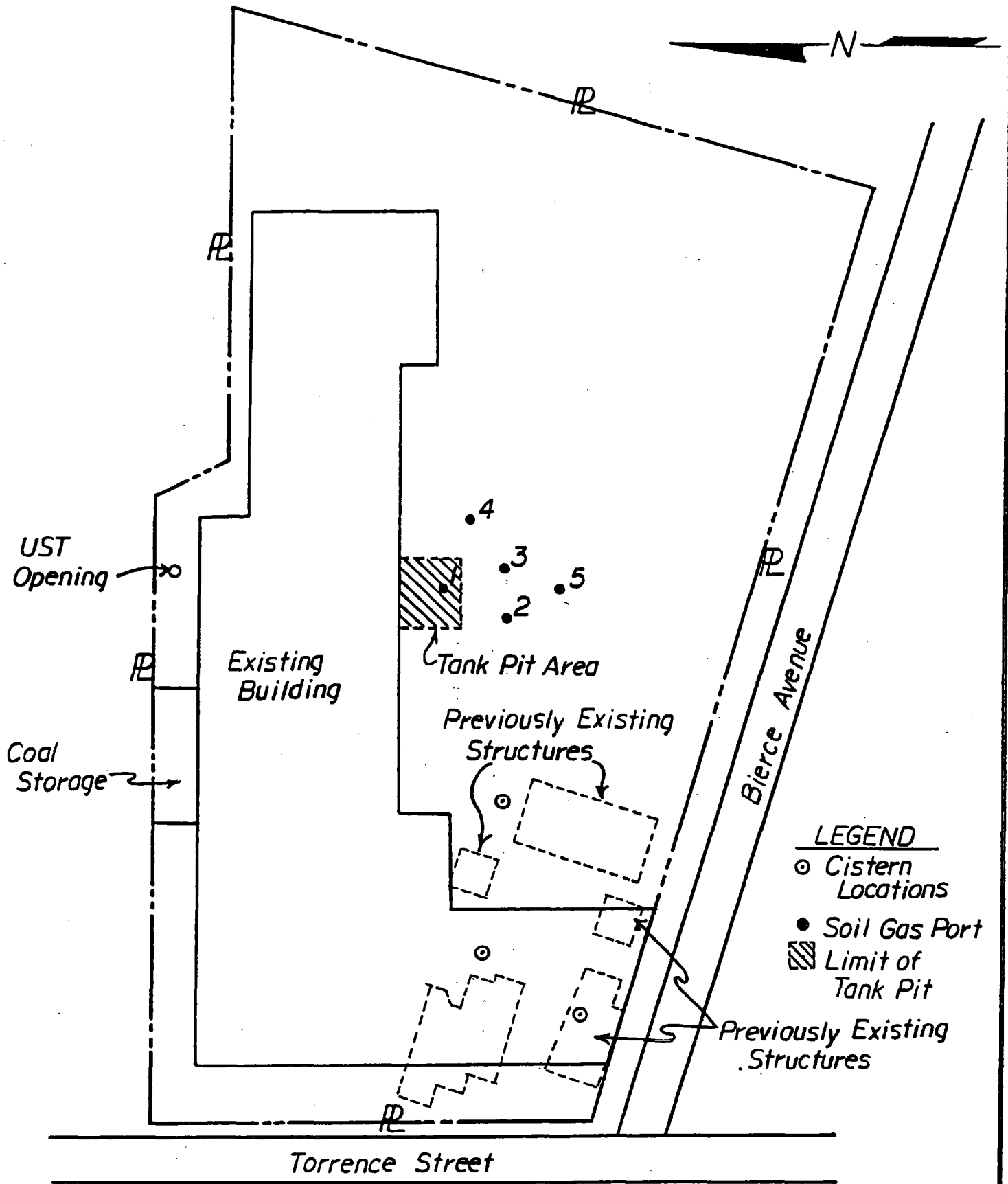
Residues were scraped from floors or walls or collected from drains and sumps utilizing a small stainless steel trowel/spatula. Samples were placed in amber jars with teflon lined lids for shipment to the ATEC Chemistry laboratory for analysis.

All sampling equipment was decontaminated between sampling locations with a trisodium phosphate detergent and potable water rinse and hexane rinse to protect against cross contamination.

4.3 Soils-Gas Survey, Exterior Sampling

A soils-gas survey was conducted around the area of the previously existing USTs. This area is depicted on Figure 12. The purpose of this survey was to preliminarily determine the likelihood of significant contaminants being associated with the solvent and gasoline storage tanks formerly located here. The soils-gas technique is a method that employs the installation of a number of shallow ports from which vapors are monitored. The monitoring was conducted through the use of an HNu.

Initially a small portable drilling rig (Minute-Man) was utilized to drill the necessary ports. Due to large



SOILS-GAS PORT LOCATIONS
 ROTH OFFICE EQUIPMENT COMPANY
 SOUTH TORRENCE STREET AND BIERCE AVENUE SITE
 DAYTON, OHIO

PROJECT NO.
 22-77032

SCALE
 1 in. = 60 ft.

FIGURE NO. 12



cobbles being present within the soil profile it became necessary to utilize a truck-mounted drilling rig for this purpose.

The ports were located to best delineate the extent of any discovered subsurface contamination. This survey is a screening aide for volatile contaminants being present. It is however deficient in its ability to three-dimensionally define contamination. It will only define a horizontal plume migration and cannot define the depth of any suspected contaminants.

Borings were taken 10 to 15 feet deep surrounding the tank area to better define migration of potential contaminants. Soils surrounding the tank areas were found to consist of a silty clay surface cover approximately 1 to 2 feet thick overlying sands and gravel to the limits of exploration. All soils extruded by the drilling were visually inspected and field monitored with the HNu as discussed earlier.

5.0 SAMPLE LOCATIONS, PARAMETERS, AND RESULTS SUMMARY

5.1 Interior Sampling Results

Interior sampling results are presented per floor. Tables are provided that summarize both field investigation and laboratory analytical results. Complete laboratory results are provided in the Appendix to this report. Samples are labeled B, 1, 2, or 3 to indicate the individual floor with B indicating basement level. Samples labeled with an E indicate elevator shaft sample locations and T indicates the sample collected in the transformer room. This is followed by either a "W" or "R" for wipe sample or residue sample, respectively, and then the consecutive sample number. "V" samples are

sediment/sludge samples collected primarily for VOC analysis.

5.1.1 Basement

Residues consisting of concrete chips as well as hard dry residues were collected as samples from the basement. Samples were also collected from sumps found in the basement area located as shown on Figure 4 and 8. The following Table 1 provides descriptions of all sample locations in the basement area. Table 2 summarizes the analytical results for PCBs and total metals.

TABLE 1
BASEMENT SAMPLE INVENTORY

<u>Sample I.D.</u>	<u>Location</u>
B-R-1	Machine pad near small diked area
B-W-2	Paint Room Wall (2 feet above floor just inside door to the right)
B-R-3	Paint Room drum outlines, concrete chips
B-R-4	Basement Coal Storage Room, concrete chips (center, left end)
B-R-5	Diked area, by drain, concrete chips
T-W-1	Wipe sample collected from floor of transformer vault
1V	Sediment and liquid from sump in maintenance room
2V	Sediment and liquid from sump in maintenance room
3V	Sediment from sump in paint room

Results of the volatile analysis performed on Sample V-1 and V-2 taken in the basement indicated no VOC's present above instrument detection limits. Acetone was detected in analysis for V-2 however this is a common laboratory solvent and is

TABLE 2

BASEMENT - SUMMARY OF ANALYTICAL RESULTS (ppm)

Sample I.D.	Total PCB's	PCB Test Kit (mV) *	TOTAL METALS (ppm)							
			Arsenic	Barium	Cadmium	Chromium	Lead	Mercury	Selenium	Silver
B-R-1	NA	133	NA	NA	NA	NA	NA	NA	NA	NA
B-W-2	0.01 mg/ 100 cm ²	NA	NA	NA	NA	NA	NA	NA	NA	NA
B-R-3	NA	131	NA	NA	NA	NA	NA	NA	NA	NA
B-R-4	NA	140	NA	NA	NA	NA	NA	NA	NA	NA
B-R-5	NA	NA	<1.0	82	3.6	58	330	<0.4	<1.0	1.4
T-W-1	<0.02 mg/ 100 cm ²	NA	NA	NA	NA	NA	NA	NA	NA	NA
V-2	18 ppm	NA	NA	NA	NA	NA	NA	NA	NA	NA
V-3	NA	NA	<1.0	130	53	235	2400	5.0	<1.0	1.7

NA = Not Analyzed

*Readings of greater than 130 mV generally indicates a
PCB concentration of at least less than 10 ppm.

considered to be an artifact of in-house laboratory activities. Therefore, consideration has not been given to the acetone in subsequent sections of this report.

5.1.2 First Floor

Dried residue samples were collected from trenches and floors primarily on the first floor. One floor tile sample was collected and one wipe sample was taken at an electrical junction box. Two wipe samples from the large supply elevator were also collected from the first floor, one from the floor and one from the wall with wipe samples also collected from the two other smaller elevators located on the first floor. Table 3 provides sample location descriptions while Table 4 provides a summary of analytical results. See Figure 9 for sample locations.

TABLE 3
FIRST FLOOR SAMPLE INVENTORY LOCATIONS

<u>Sample I.D.</u>	<u>Location</u>
1-R-1	Trench, 58 feet from north wall in grinding area
1-R-2	Trench, at corner near elevator in center of building
1-R-3	Non-slip floor covering, 30 feet from windows in automatic screw machine area
1-R-4	Floor plug residues in drill area
1-R-5	Floor tiles near trench
1-W-2	Junction box on north wall in mill area
E-W-1	East elevator, floor sample
E-W-2	Center elevator near radial drill area, off of inside rail
E-W-3	Passenger elevator in office area, inside slide rail
E-W-4	East elevator, inside slide rail

TABLE 4
FIRST FLOOR SUMMARY OF ANALYTICAL RESULTS

<u>Sample I.D.</u>	<u>Total PCB's</u>	<u>Test Kit (mV) *</u>
1-R-1	NA	133
1-R-2	NA	134
1-R-3	17.0 ppm	77
1-R-4	<1.0 ppm	49
1-R-5	NA	142
1-W-2	<0.01 mg/100 cm ²	NA
E-W-1	0.01 mg/100 cm ²	NA
E-W-2	<0.01 mg/100 cm ²	NA
E-W-4	.03 mg/100 cm ²	NA

NA = Not Analyzed

*Readings of greater than 130 mV generally indicates a PCB concentration of at least less than 10 ppm.

5.1.3 Second Floor

Four samples were collected from the second floor of the facility. These were located primarily in the assembly areas. Table 5 provides a summary of sample locations while Table 6 summarizes analytical results. See Figure 10 for sample locations.

TABLE 5

SECOND FLOOR SAMPLE INVENTORY LOCATIONS

<u>Sample I.D.</u>	<u>Location</u>
2-R-1	Residues on floor in mechanical assembly area
2-W-1	Stain on floor in mechanical assembly area
2-W-2	Stain on floor in mechanical assembly area
2-W-3	Stain on floor in stock room area

TABLE 6

SECOND FLOOR SUMMARY OF ANALYTICAL RESULTS

<u>Sample I.D.</u>	<u>Total PCB's</u>	<u>Test Kit (mV) *</u>
2-R-1	190 ppm	100
2-W-1	0.01 mg/100 cm ²	NA
2-W-2	<0.01 mg/100 cm ²	NA
2-W-3	0.01 mg/100 cm ²	NA

NA = Not Analyzed

*Readings of greater than 130 mV generally indicates a PCB concentration of at least less than 10 ppm.

5.1.4 Third Floor

Residues and wipe samples were collected from the third floor at three locations. These were primarily from stains noted in the assembly area of the floor. Table 7 provides an inventory of these sample locations with analytical results provided in Table 8. See Figure 11 for sample locations.

TABLE 7
THIRD FLOOR SAMPLE INVENTORY LOCATIONS

<u>Sample I.D.</u>	<u>Location</u>
3-R-1	Residues from machine base in miscellaneous assembly area
3-W-1	Stain on floor in miscellaneous assembly area
3-W-2	Stain on column in scale and printer final assembly area

TABLE 8
THIRD FLOOR - SUMMARY OF ANALYTICAL RESULTS

<u>Sample I.D.</u>	<u>Total PCB's</u>	<u>Test Kit (mV) *</u>
3-R-1	NA	142
3-W-1	<0.01 mg/100 cm ²	NA
3-W-2	<0.01 mg/100 cm ²	NA

NA = Not Analyzed

*Readings of greater than 130 mV generally indicates a PCB concentration of at least less than 10 ppm.

5.2 Soils-Gas and Sample Analytical Results

As described in Section 4.3 soils-gas ports were installed around the location of two previously existing USTs. Air monitoring of these ports within the soils revealed TPVs generally below detection levels for the HNu photoionization detector utilized, or 1 ppm. Musty fuel odors were detected during these procedures. This can be indicative of degraded hydrocarbon products.

Four samples of soil were collected from around this tank area, Samples 1A and 4A were taken at 8 feet depths while Samples 1B and 4B were taken at 15.0 feet deep at port locations 1 and 4 as shown on Figure 12. All four samples were of granular silty sand soils. Each was analyzed for volatile organic compounds (VOC). All results revealed no volatiles detected with the exception of methylene chloride, acetone and 2-butanone. These are all common laboratory contaminants that are felt to be present as the result of in-house introduction. Thus these chemicals have not been considered for this report.

Again, complete analytical results are provided in the Appendix to this report.

5.3 QA/QC-Sampling Controls

ATEC's in house laboratory was utilized for all analytical activities for this project. In order to ensure that proper analytical protocols are implemented, the laboratory has a comprehensive quality assurance/quality control program designed to maintain the accuracy and precision required for environmental analyses. Copies of all laboratory logs, workup sheets, calculations, chromatograms, QA/QC runs, etc. for all samples have been retained.

Sample controls included the use of field blanks and duplicates to detect laboratory and/or field contamination and variation. Field blanks consisting of distilled deionized water were transported to the site with all other sample containers and handled under the same conditions.

Field personnel have retained a detailed record of all activities performed at the site. All observations,

problems, modifications and communications have been documented.

6.0 CONCLUSIONS AND RECOMMENDATIONS

Based upon investigations conducted to date it is evident that areas of minor environmental concern exist at this site. PCB contaminants were encountered, as were elevated heavy metals concentrations. From samples analyzed VOCs were not found to be a problem within the facility.

6.1 PCB Contaminants - Regulatory Status

Polychlorinated biphenyls (PCB) are classified as toxic substances and have been found to have health effects on persons exposed to them. These effects include chloracne, a painful skin disorder. In addition PCB is a suspected carcinogenic agent. Further, PCB's are resistant to degradation, bioaccumulate in fatty tissues of organisms, and animal experiments have proven they can have a potential reproductive effect. The principal routes of exposure to PCB'S would be from absorption through skin, inhalation and ingestion.

It is also suspected that transformers maintained by DP&L at the site contain PCB's. Testing is to be conducted by DP&L and should this prove to be correct these transformers should be replaced. A wipe sample collected in the transformer vault did not reveal PCB's above method detection limits however.

Federal regulations pertaining to the cleanup of releases of materials containing PCB's at concentrations of 50 ppm or greater have been finalized per 40 CFR 761 regulations. This policy however applies to spills which occur after the effective date of the policy, or after

May 4, 1987. The U.S. EPA recognizes that old spills discovered after the date of this policy will require site-by-site evaluation because of the likelihood that the site involves more pervasive PCB contamination than fresh spills, and old spills are generally more difficult to clean than fresh spills. For these cases decontamination requirements would be established at the discretion of the U.S. EPA. However, it can be expected, and it is usual, that once old spills are defined, the new spill cleanup standards are applied.

In accordance with U.S. EPA policy the former Hobart facility can be considered as a "restricted access area" or by definition an area at least 0.1 km from a residential area and limited by man made barriers (e.g., fences and walls) which would generally include industrial facilities and extremely remote rural locations. It is also possible to breakdown the interior of the facility into high-contact industrial surfaces and low-contact industrial surfaces. All high contact surfaces have been removed from the facility and would include machinery and control panels predominately. Low contact industrial surfaces include ceilings, walls, floors, roofs, roadways and sidewalks and unmanned machinery.

In accordance with the above described policy and site characterization decontamination requirements should conform to the following:

1. High contact solid surfaces cleaned to .01 mg/100 cm² (as measured by standard wipe tests).
2. Low contact, indoor, impervious solid surfaces (e.g., metals glass, aluminum

siding and enameled or laminated surfaces) cleaned to $.01 \text{ mg}/100 \text{ cm}^2$.

3. At the option of the responsible party, low contact, indoor nonimpervious surfaces (e.g., wood, concrete, asphalt, and plasterboard) will be cleaned to either a) $.01 \text{ mg}/100 \text{ cm}^2$ or to b) $0.10 \text{ mg}/100 \text{ cm}^2$ and encapsulated.

4. Low contact, outdoor surfaces (both impervious and nonimpervious) cleaned to $0.10 \text{ mg}/100 \text{ cm}^2$.

5. Soil and residues contaminated by a spill will be cleaned to 25 ppm PCB's by weight.

In evaluating all wipe samples analyzed for this facility all results except one, an elevator shaft sample, indicated levels of PCB's at, or below, the above requirements.

Elevated levels were detected in sediments and residues collected from the facility. This was generally limited to only a few areas however; the sumps in the basement facility, two locations on the first floor, floor coverings in the screw machine area and oily residues caught in the floor plug/outlets in the drill area as shown on Figure 9.

Some sampling involved the utilization of a test kit for the PCB screening. This test kit is an inexpensive tool to aid in detecting the presence of PCB contaminants. Should results be positive, less than 130 mV, further analysis with gas chromatography (GC) is generally conducted to determine the exact concentrations and types

of PCB's present. Also, the test kit is not fully capable of screening for only PCB contaminants and interference by other chlorinated compounds can occur. The results of the samples screened indicated that no chlorinated compounds of any type were present above the method detection level with the exception of Samples 1-R-3, 1-R-4 and 2-R-1. As a result these samples were analyzed by GC.

In most cases, the levels found within the facility may be considered as being low level contaminants. The policy standards discussed previously as set forth by the U.S. EPA generally involve spills containing PCB's in levels of 50 ppm or greater. The new cleanup standards are based upon the PCB level contained in the material spilled. For old spills where this level is unknown analysis of residual materials must be substituted. For the most part residues contained at the facility were below established standards for low contact industrial surfaces. One sample, 2-R-1, was found to contain 190 ppm PCB's. This appeared to be a non-slip surface or glue substance possibly spilled in the area. This area and residue will require a thorough cleaning and removal of the residue should be performed. The area involved is small and should not be too difficult to handle.

It is obvious that PCB containing oils or substances were utilized at the facility. Although results from locations sampled for the most part were low, the possibility of other elevated areas remains. ATEC would therefore recommend some additional interior cleaning of the facility. This should primarily include some scrubbing of the floors and walls of the plant and the scraping up and disposal of residues, particularly built up areas such as where Sample 2-R-1 revealed 190 ppm PCB's. Some type of sealant over concrete floors and

walls is also recommended. While a rinsing method of cleaning will not completely remove PCB's that could permeate porous concrete surfaces it should be sufficient with a surface seal to adequately contain low levels present. (It should be noted that a sealing method will require periodic maintenance.)

As one final note, because of both regulatory and liability concerns the PCB cleaning activities should only be undertaken by a company properly trained in the handling of PCB contaminants.

6.2 Heavy Metal Contaminants - Regulatory Status

Two residue samples were collected for metal analysis. Both samples were collected in the basement of the facility. Regulatory standards for metals have not generally been established and if levels and quantities appear to be excessive they can involve negotiation with appropriate regulatory authorities.

One set of comparative criteria is established by the State of California regulations as their Total Threshold Limit Concentration (TTLIC) levels. These values are generally used for evaluating a waste for landfilling classification and they do not necessarily totally reflect the toxic characteristics of a particular substance or all modes of potential exposure. California tends to be somewhat more aggressive in their environmental management than most other states, and in many cases even the Federal Government. Therefore, their contaminant levels can serve as a general guide for other geographical areas. The contention is that if a site satisfies California environmental criteria it will most likely meet those established for the state in which the project occurs, in this case Ohio.

The California regulations include total values for compounds for classification as hazardous, as listed in Table 9 below.

TABLE 9
CALIFORNIA TOTAL THRESHOLD LIMIT
CONCENTRATION OF HAZARDOUS WASTE

	<u>ppm</u>
Arsenic	500
Barium	10,000
Cadmium	100
Chromium	500
Lead	1,000
Nickel	2,000
Zinc	5,000

Analytical results as reported in Table 2 of Section 5.1.1 indicate a lead concentration of 2,400 ppm which is greater than the above limits. This sample is a sediment residue collected in a sump pit located in what appeared to be a paint storage room in the basement. (Sample V-3)

Although this one sample was found to be in excess of these total lead guidelines, other discovered factors down play its significance. Upon examination the floor sumps were discovered to contain concrete floors. This fact will tend to limit the ability of the material to migrate. Further the amount of residue discovered was very small amounting to no more than 0.5 cubic feet. It is also highly probable that the type of lead present is in a form that would not be highly leachable thus further limiting potential problems. What the lead discovery is most useful in doing is in illustrating the most probable utilization of the small room containing the sump that being, as suspected, the storage of paints. In the past, at least in part, those that were lead based.

6.3 Incinerator

Significant quantities of material were not found to be associated with the old incinerator. However, the discovery of PCB's over a large portion of the facility make it more possible that materials incinerated could have led to the generation of dioxins and furans. Both of these compounds are potentially very toxic. The only way to verify this would be to conduct a special analysis of residues in the incinerator. Current air quality regulations make the future utilization of the incinerator impractical if not illegal. It would therefore be highly unlikely that the need to make use of the incinerator would arise. Thus potential exposure to residue in the incinerator would be less likely. It would be recommended that this structure simply be sealed. Should it ever become necessary to disturb the structure, sampling and analysis for dioxin and furans content may be advisable.

6.4 Underground Storage Tanks

The soils-gas survey as well as confirmatory sampling and analysis generally revealed no unusual environmental conditions in or around the area of the two removed USTs. Only a slight musty odor was detected in the soils. This may have been from a leak in one of the tanks but more likely was due to product spilled during filling operations or the removals. However it appears extensive degradation of the product has occurred and no environmental hazard is believed to exist.

One fuel oil tank remains on the facility property. The tank is currently not utilized as boilers are now fired by gas. Based on the age of the existing facility and

therefore possible age of the tank. ATEC recommends the closure/removal of this tank to limit future potential liabilities.

Contamination of soils surrounding the tank, if any, could not be evaluated with the use of the soils-gas survey due to the low volatility of the fuel oil. At the time of the tank closure it is therefore recommended that an evaluation of the soils surrounding the tank be performed to verify whether any product releases have occurred. If contaminants are discovered they can be remediated at that time. A proposal for the closure of this tank and/or recommended closure procedures can be supplied upon request.

7.0 SUMMARY

An environmental assessment of the vacant Hobart Manufacturing Plant at 216 Torrence Avenue in Dayton, Ohio has been performed by ATEC. This work was performed for Roth Office Equipment Company who is initiating a potential purchase of the site for its use predominately as a warehouse.

Investigations have revealed that some PCB containing materials were utilized at the facility. Detected levels were found in most cases at or below, levels established by the U.S. EPA for cleanup of recent PCB spills. No cleanup levels have been established for previous, or old, spills, but it is usual to expect cleanup standards applied to preexisting spills to be similar to those established for new spills.

A thorough cleaning of the facility is recommended that should predominately include floors and walls. ATEC also recommends a sealant to then cover and further contain these

surfaces. Concentrations were generally found to be within standards set by the U.S. EPA however limitations of sampling for this project cannot fully eliminate the possibility of levels above these thresholds at other locations.

Elevated metals, particularly lead, were detected in the basement sumps predominately near apparent old paint storage areas. The amount of contaminated material discovered however, dramatically reduces the need for concern. One underground fuel tank remains which ATEC recommends be removed. Two tanks were removed in 1983 and significant contaminants were not found in the general vicinity.

8.0 LIMITATIONS OF STUDY

This study was designed to evaluate existing and future environmental liabilities being associated with the previous use or ownership of the property. ATEC is not responsible for information lacking as a result of non-disclosure of pertinent material by the seller or his agents and/or the client or his agents. ATEC is further not responsible for conclusions drawn from this information by parties independent of ATEC.

During the course of this investigation very little was observed that would indicate that environmental problems exist beyond those discussed. Although areas not sampled can not definitively be stated to be free of contaminants. It must also be noted that groundwater was beyond the scope of this investigation.

APPENDIX

Analytical Results

February 1, 1988

Mr. Mark Elliott
ATEC Associates, Inc.
11306 Tamarco Drive
Cincinnati, OH 45242-2108

Re: Nine Soil PCB: SW 846 Method 8080
Two Soil VOA, RCRA Metals: SW 846 Method 8240, 7000 Series
Ten PCB Screen: McGraw Edison Test Kit
Roth Office Equipment Company
ATEC Project Number 22-77032

Dear Mr. Elliott:

Enclosed are the results of the Chemical Analyses for the twenty soil samples which were submitted to the ATEC Environmental/Analytical Testing Division on January 21, 1988, on behalf of Roth Office Equipment Company. The volatile samples were analyzed on a Finnigan 1020 OWA GC/MS/DS system, complete with Superincos Software, via SW 846 Method 8240 for Purgeable Organic Compounds. Prior to analysis the system was tuned against Bromofluorobenzene and calibrated with the appropriate standard. The PCB analyses were performed on a Varian 3700 Gas Chromatograph using Electron Capture Detection via SW 846 Method 8080. Metals were analyzed on a Varian SpectrAA-10 Atomic Absorption Spectrophotometer according to the 7000 series of the methods outlined in SW 846. PCB screens were performed on a McGraw Edison Test Kit.

All associated Quality Control information will be maintained in the Testing Division files, a copy of which can be forwarded to you upon request. After a thirty-day period, a fee will be assessed for this additional information.

Samples and extracts will be held for periods of thirty and forty-five days, respectively, following the date of this report, after which re-analysis will require the submission of fresh samples. It has been a pleasure serving you and, as always, if there are any questions concerning these results or the ATEC Policies, please feel free to contact me.

Respectfully submitted,

ATEC Associates, Inc.

Keith S. Kline

Keith S. Kline
Environmental/Analytical
Testing Division

REPORT OF TEST RESULTS

ATEC Project Number 22-77032

DATE: January 27, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: Total PCB Analysis
SW 846 Method 8080

SAMPLE TAKEN BY: ATEC (DC)

DATE SAMPLED: January 20, 1988

DATE RECEIVED: January 21, 1988

DATE EXTRACTED: January 22, 1988

DATE ANALYZED: January 25 and 26, 1988

ANALYST: J. Finks

*PCB identified as Aroclor 1260 in each sample

**Compound detected below quantitation limit

Sample I.D.	Total PCB*	Quantitation Limit
B-W-2	.01 mg/100 cm ²	.01 mg/100 cm ²
1-W-2	<.01 mg/100 cm ² **	.01 mg/100 cm ²
E-W-1	.01 mg/100 cm ²	.01 mg/100 cm ²
2-W-1	.01 mg/100 cm ²	.01 mg/100 cm ²
2-W-2	<.01 mg/100 cm ² **	.01 mg/100 cm ²
2-W-3	.01 mg/100 cm ²	.01 mg/100 cm ²
3-W-1	<.01 mg/100 cm ² **	.01 mg/100 cm ²
3-W-2	<.01 mg/100 cm ² **	.01 mg/100 cm ²
V-2	18,000 ppb	30 ppb

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline
Environmental/Analytical Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: V-1
Date Sample Collected: January 20, 1988
Date Sample Received: January 21, 1988
Date Sample Analyzed: January 27, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80157I

1 of 2

Analyte	CAS Number	Concentration (ug/L)	Quantitation Limit (ug/L)
Chloromethane	74-87-3	<10	10
Bromomethane	74-83-9	<10	10
Vinyl Chloride	75-01-4	<10	10
Chloroethane	75-00-3	<10	10
Methylene Chloride	75-09-2	< 5*	5
Acetone	67-64-1	<10*	10
Carbon Disulfide	75-15-0	< 5	5
1,1-Dichloroethene	75-35-4	< 5	5
1,1 Dichloroethane	75-35-3	< 5	5
Trans-1,2-Dichloroethene	156-60-5	< 5	5
Chloroform	67-66-3	< 5	5
1,2-Dichloroethane	107-06-2	< 5	5
2-Butanone	78-93-3	<10*	10
1,1,1-Trichloroethane	71-55-6	< 5	5
Carbon Tetrachloride	56-23-5	< 5	5
Vinyl Acetate	108-05-4	<10	10
Bromodichloromethane	75-27-4	< 5	5
1,2-Dichloropropane	78-87-5	< 5	5

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80157I

Analyte	CAS Number	Concentration (ug/L)	Quantitation Limit (ug/L)
Trans-1, 3-Dichloropropene	10061-02-6	< 5	5
Trichloroethene	79-01-6	< 5	5
Dibromochloromethane	124-48-1	< 5	5
1,1,2-Trichloroethane	79-00-5	< 5	5
Benzene	71-43-2	< 5	5
cis-1,3-Dichloropropene	10061-01-5	< 5	5
2-Chloroethylvinylether	110-75-8	<10	10
Bromoform	75-25-2	< 5	5
4-Methyl-2-Pentanone	591-78-6	<10	10
2-Hexanone	108-10-1	<10	10
Tetrachloroethene	127-18-4	< 5	5
1,1,2,2-Tetrachloroethane	79-34-5	< 5	5
Toluene	108-88-3	< 5*	5
Chlorobenzene	108-90-7	< 5	5
Ethylbenzene	100-41-4	< 5	5
Styrene	100-42-5	< 5	5
Total Xylenes		< 5	5

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: EPA Method 624

Analyst: K. Kline

Verified:

Date Reported: January 30, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: V-2
Date Sample Collected: January 20, 1988
Date Sample Received: January 21, 1988
Date Sample Analyzed: January 27, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80157J

1 of 2

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Chloromethane	74-87-3	<40	40
Bromomethane	74-83-9	<40	40
Vinyl Chloride	75-01-4	<40	40
Chloroethane	75-00-3	<40	40
Methylene Chloride	75-09-2	<20*	20
Acetone	67-64-1	93	40
Carbon Disulfide	75-15-0	<20	20
1,1-Dichloroethene	75-35-4	<20	20
1,1 Dichloroethane	75-35-3	<20	20
Trans-1,2-Dichloroethene	156-60-5	<20	20
Chloroform	67-66-3	<20	20
1,2-Dichloroethane	107-06-2	<20	20
2-Butanone	78-93-3	<40*	40
1,1,1-Trichloroethane	71-55-6	<20	20
Carbon Tetrachloride	56-23-5	<20	20
Vinyl Acetate	108-05-4	<40	40
Bromodichloromethane	75-27-4	<20	20
1,2-Dichloropropane	78-87-5	<20	20

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80157J

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Trans-1, 3-Dichloropropene	10061-02-6	<20	20
Trichloroethene	79-01-6	<20	20
Dibromochloromethane	124-48-1	<20	20
1,1,2-Trichloroethane	79-00-5	<20	20
Benzene	71-43-2	<20	20
cis-1,3-Dichloropropene	10061-01-5	<20	20
2-Chloroethylvinylether	110-75-8	<40	40
Bromoform	75-25-2	<20	20
4-Methyl-2-Pentanone	591-78-6	<40	40
2-Hexanone	108-10-1	<40	40
Tetrachloroethene	127-18-4	<20	20
1,1,2,2-Tetrachloroethane	79-34-5	<20	20
Toluene	108-88-3	<20*	20
Chlorobenzene	108-90-7	<20	20
Ethylbenzene	100-41-4	<20	20
Styrene	100-42-5	<20	20
Total Xylenes		<20	20

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: SW 846 Method 8240

Analyst: K. Kline

Verified:

Date Reported: January 30, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

REPORT OF TEST RESULTS

ATEC Project Number 22-77032

DATE: January 28, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: Total Metal Analysis

SAMPLE MATRIX: Soil

SAMPLE TAKEN BY: ATEC (DC)

DATE RECEIVED: January 21, 1988

ANALYST: JSS

*Method Detection Limit

Parameter (units in mg/kg unless noted)	Sample I.D. Number			SW 846 Analytical Method No.
	V-3	B-R-5	MDL*	
<u>Total Metals</u>				
Arsenic	<1.0	<1.0	1.0	7060
Barium	130	82	5.0	7080
Cadmium	53	3.6	0.5	7130
Chromium	235	58	0.5	7190
Lead	2400	330	0.5	7420
Mercury	5.0	<0.4	0.4	7470
Selenium	<1.0	<1.0	1.0	7740
Silver	1.7	1.4	0.5	7760

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline
Environmental/Analytical Testing Division

REPORT OF TEST RESULTS

ATEC Project Number 22-77032

DATE: January 28, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: McGraw-Edison PCB Screen

SAMPLE TAKEN BY: ATEC (DC)

DATE SAMPLED: January 20, 1988

DATE RECEIVED: January 21, 1988

DATE EXTRACTED: January 22, 1988

DATE ANALYZED: January 27, 1988

ANALYST: AD, PS

*Readings of greater than 130 mV generally indicate a PCB
concentration of less than 10 ppm

<u>Sample No.</u>	<u>mV Reading*</u>
B-R-1	133
B-R-3	131
B-R-4	140
B-R-4, Dup	138
1-R-1	133
1-R-2	134
1-R-3	77
1-R-4	49
1-R-5	142
2-R-1	100
3-R-1	142
3-R-1, Dup	136

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline
Environmental/Analytical Testing Division

February 4, 1988

Mr. Mark Elliott
ATEC Associates, Inc.
11306 Tamarco Drive
Cincinnati, OH 45242-4871

Re: Three Soil PCB: SW 846 Method 8080
Four Soil VOA: SW 846 Method 8240
Roth Office Equipment Company
ATEC Project Number 22-77032

Dear Mr. Elliott:

Enclosed are the results of the Organic Analyses for the seven soil samples which were submitted to the ATEC Environmental/Analytical Testing Division on January 27 and 29, 1988, on behalf of the Roth Office Equipment Company. The volatile samples were analyzed on a Finnigan 1020 OWA GC/MS/DS system, complete with Superincos Software, via SW 846 Method 8240 for Purgeable Organic Compounds. Prior to analysis the system was tuned against Bromofluorobenzene and calibrated with the appropriate standard. The PCB analyses were performed on a Varian 3700 Gas Chromatograph using Electron Capture Detection via SW 846 Method 8080.

The Method Blank indicated in-house contamination of 12 ppb Methylene Chloride, 16 ppb Acetone, and 11 ppb 2-Butanone. All associated Quality Control information will be maintained in the Testing Division files, a copy of which can be forwarded to you upon request. After a thirty-day period, a fee will be assessed for this additional information.

Samples and extracts will be held for a period of thirty days following the date of this report, after which re-analysis will require the submission of fresh samples. It has been a pleasure serving you and, as always, if there are any questions concerning these results or the ATEC Policies, please feel free to contact me.

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline

Keith S. Kline
Environmental/Analytical
Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: 1A
Date Sample Collected: January 25, 1988
Date Sample Received: January 27, 1988
Date Sample Analyzed: January 28, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80204A

1 of 2

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Chloromethane	74-87-3	<18	18
Bromomethane	74-83-9	<18	18
Vinyl Chloride	75-01-4	<18	18
Chloroethane	75-00-3	<18	18
Methylene Chloride	75-09-2	21	9
Acetone	67-64-1	30	18
Carbon Disulfide	75-15-0	< 9	9
1,1-Dichloroethene	75-35-4	< 9	9
1,1 Dichloroethane	75-35-3	< 9	9
Trans-1,2-Dichloroethene	156-60-5	< 9	9
Chloroform	67-66-3	< 9	9
1,2-Dichloroethane	107-06-2	< 9	9
2-Butanone	78-93-3	<18*	18
1,1,1-Trichloroethane	71-55-6	< 9	9
Carbon Tetrachloride	56-23-5	< 9	9
Vinyl Acetate	108-05-4	<18	18
Bromodichloromethane	75-27-4	< 9	9
1,2-Dichloropropane	78-87-5	< 9	9

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80204A

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Trans-1, 3-Dichloropropene	10061-02-6	< 9	9
Trichloroethene	79-01-6	< 9	9
Dibromochloromethane	124-48-1	< 9	9
1,1,2-Trichloroethane	79-00-5	< 9	9
Benzene	71-43-2	< 9	9
cis-1,3-Dichloropropene	10061-01-5	< 9	9
2-Chloroethylvinylether	110-75-8	<18	18
Bromoform	75-25-2	< 9	9
4-Methyl-2-Pentanone	591-78-6	<18	18
2-Hexanone	108-10-1	<18	18
Tetrachloroethene	127-18-4	< 9	9
1,1,2,2-Tetrachloroethane	79-34-5	< 9	9
Toluene	108-88-3	< 9*	9
Chlorobenzene	108-90-7	< 9	9
Ethylbenzene	100-41-4	< 9	9
Styrene	100-42-5	< 9	9
Total Xylenes		< 9	9

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: SW 846 Method 8240

Analyst: K. Kline

Verified:

Date Reported: February 3, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: 1B
Date Sample Collected: January 25, 1988
Date Sample Received: January 27, 1988
Date Sample Analyzed: January 28, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80204B

1 of 2

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Chloromethane	74-87-3	<18	18
Bromomethane	74-83-9	<18	18
Vinyl Chloride	75-01-4	<18	18
Chloroethane	75-00-3	<18	18
Methylene Chloride	75-09-2	30	9
Acetone	67-64-1	39	18
Carbon Disulfide	75-15-0	< 9	9
1,1-Dichloroethene	75-35-4	< 9	9
1,1 Dichloroethane	75-35-3	< 9	9
Trans-1,2-Dichloroethene	156-60-5	< 9	9
Chloroform	67-66-3	< 9	9
1,2-Dichloroethane	107-06-2	< 9	9
2-Butanone	78-93-3	<18*	18
1,1,1-Trichloroethane	71-55-6	< 9	9
Carbon Tetrachloride	56-23-5	< 9	9
Vinyl Acetate	108-05-4	<18	18
Bromodichloromethane	75-27-4	< 9	9
1,2-Dichloropropane	78-87-5	< 9	9

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80204B

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Trans-1, 3-Dichloropropene	10061-02-6	< 9	9
Trichloroethene	79-01-6	< 9	9
Dibromochloromethane	124-48-1	< 9	9
1,1,2-Trichloroethane	79-00-5	< 9	9
Benzene	71-43-2	< 9	9
cis-1,3-Dichloropropene	10061-01-5	< 9	9
2-Chloroethylvinylether	110-75-8	<18	18
Bromoform	75-25-2	< 9	9
4-Methyl-2-Pentanone	591-78-6	<18	18
2-Hexanone	108-10-1	<18	18
Tetrachloroethene	127-18-4	< 9	9
1,1,2,2-Tetrachloroethane	79-34-5	< 9	9
Toluene	108-88-3	< 9*	9
Chlorobenzene	108-90-7	< 9	9
Ethylbenzene	100-41-4	< 9	9
Styrene	100-42-5	< 9	9
Total Xylenes		< 9	9

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: SW 846 Method 8240

Analyst: K. Kline

Verified:

Date Reported: February 3, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: 4A
Date Sample Collected: January 25, 1988
Date Sample Received: January 27, 1988
Date Sample Analyzed: January 28, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80204C

1 of 2

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Chloromethane	74-87-3	<16	16
Bromomethane	74-83-9	<16	16
Vinyl Chloride	75-01-4	<16	16
Chloroethane	75-00-3	<16	16
Methylene Chloride	75-09-2	27	8
Acetone	67-64-1	33	16
Carbon Disulfide	75-15-0	< 8	8
1,1-Dichloroethene	75-35-4	< 8	8
1,1 Dichloroethane	75-35-3	< 8	8
Trans-1,2-Dichloroethene	156-60-5	< 8	8
Chloroform	67-66-3	< 8	8
1,2-Dichloroethane	107-06-2	< 8	8
2-Butanone	78-93-3	<16*	16
1,1,1-Trichloroethane	71-55-6	< 8	8
Carbon Tetrachloride	56-23-5	< 8	8
Vinyl Acetate	108-05-4	<16	16
Bromodichloromethane	75-27-4	< 8	8
1,2-Dichloropropane	78-87-5	< 8	8

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80204C

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Trans-1, 3-Dichloropropene	10061-02-6	< 8	8
Trichloroethene	79-01-6	< 8	8
Dibromochloromethane	124-48-1	< 8	8
1,1,2-Trichloroethane	79-00-5	< 8	8
Benzene	71-43-2	< 8	8
cis-1,3-Dichloropropene	10061-01-5	< 8	8
2-Chloroethylvinylether	110-75-8	<16	16
Bromoform	75-25-2	< 8	8
4-Methyl-2-Pentanone	591-78-6	<16	16
2-Hexanone	108-10-1	<16	16
Tetrachloroethene	127-18-4	< 8	8
1,1,2,2-Tetrachloroethane	79-34-5	< 8	8
Toluene	108-88-3	< 8	8
Chlorobenzene	108-90-7	< 8	8
Ethylbenzene	100-41-4	< 8	8
Styrene	100-42-5	< 8	8
Total Xylenes		< 8	8

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: SW 846 Method 8240

Analyst: K. Kline

Verified:

Date Reported: February 3, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

Client: Roth Office Equipment Company
Client Address: 216 South Torrence Street
Dayton, Ohio

Client Sample Identification: 4B
Date Sample Collected: January 25, 1988
Date Sample Received: January 27, 1988
Date Sample Analyzed: January 28, 1988

VOLATILE COMPOUNDS
ANALYTICAL RESULTS

ATEC Lab No. 80204D

1 of 2

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Chloromethane	74-87-3	<16	16
Bromomethane	74-83-9	<16	16
Vinyl Chloride	75-01-4	<16	16
Chloroethane	75-00-3	<16	16
Methylene Chloride	75-09-2	15	8
Acetone	67-64-1	26	16
Carbon Disulfide	75-15-0	< 8	8
1,1-Dichloroethene	75-35-4	< 8	8
1,1 Dichloroethane	75-35-3	< 8	8
Trans-1,2-Dichloroethene	156-60-5	< 8	8
Chloroform	67-66-3	< 8	8
1,2-Dichloroethane	107-06-2	< 8	8
2-Butanone	78-93-3	<16*	16
1,1,1-Trichloroethane	71-55-6	< 8	8
Carbon Tetrachloride	56-23-5	< 8	8
Vinyl Acetate	108-05-4	<16	16
Bromodichloromethane	75-27-4	< 8	8
1,2-Dichloropropane	78-87-5	< 8	8

* Analyte detected but amount present is less than the quantitation Limit.

ANALYTICAL RESULTS

ATEC Lab No. 80204D

Analyte	CAS Number	Concentration (ug/kg)	Quantitation Limit (ug/kg)
Trans-1, 3-Dichloropropene	10061-02-6	< 8	8
Trichloroethene	79-01-6	< 8	8
Dibromochloromethane	124-48-1	< 8	8
1,1,2-Trichloroethane	79-00-5	< 8	8
Benzene	71-43-2	< 8	8
cis-1,3-Dichloropropene	10061-01-5	< 8	8
2-Chloroethylvinylether	110-75-8	<16	16
Bromoform	75-25-2	< 8	8
4-Methyl-2-Pentanone	591-78-6	<16	16
2-Hexanone	108-10-1	<16	16
Tetrachloroethene	127-18-4	< 8	8
1,1,2,2-Tetrachloroethane	79-34-5	< 8	8
Toluene	108-88-3	< 8	8
Chlorobenzene	108-90-7	< 8	8
Ethylbenzene	100-41-4	< 8	8
Styrene	100-42-5	< 8	8
Total Xylenes		< 8	8

* Analyte detected but amount present is less than the Quantitation Limit.

Analytical Method: SW 846 Method 8240

Analyst: K. Kline

Verified:

Date Reported: February 3, 1988

Respectfully submitted,

Keith S. Kline
Environmental/Analytical Testing Division

REPORT OF TEST RESULTS

ATEC Project Number 22-77032

DATE: February 3, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: Total PCB Analysis

SAMPLE TAKEN BY: ATEC (BN)

DATE RECEIVED: January 29, 1988

DATE EXTRACTED: January 29, 1988

DATES ANALYZED: February 2 and 3, 1988

ANALYST: J. Finks

*PCB identified as Aroclor 1260

<u>Sample I.D.</u>	<u>Total PCB</u>	<u>Quantitation Limit</u>
1-R-3	17 ppm*	0.01 ppm
1-R-4	<1.0 ppm	1.0 ppm
2-R-1	190 ppm*	0.01 ppm

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline
Environmental/Analytical Testing Division

CHAIN OF CUSTODY RECORD

[illegible]

February 12, 1988

Mr. Mark Elliott
ATEC Associates, Inc.
11306 Tamarco Drive
Cincinnati, OH 45242-1408

Re: Three Wipe PCB, SW 846 Method 8080
One Fuel Scan
Roth Office Equipment Company
ATEC Project Number 22-77032

Dear Mr. Elliott:

Enclosed are the results of the Organic Analyses for the one water and three wipe samples which were submitted to the ATEC Environmental/Analytical Testing Division on February 2 and 8, 1988, on behalf of Roth Office Equipment Company. These analyses were performed on a Varian 3700 Gas Chromatograph using Electron Capture Detection via SW 846 Method 8080 for PCB and Flame Ionization Detection for Total Hydrocarbons.

All associated Quality Control information will be maintained in the Testing Division files, a copy of which can be forwarded to you upon request. After a thirty-day period, a fee will be assessed for this additional information.

Samples and extracts will be held for periods of thirty and forty-five days, respectively, following the date of this report, after which re-analysis will require the submission of fresh samples. It has been a pleasure serving you and, as always, if there are any questions concerning these results or the ATEC Policies, please feel free to contact me.

Respectfully submitted,

ATEC Associates, Inc.

Keith S. Kline

Keith S. Kline
Environmental/Analytical
Testing Division

REPORT OF TEST RESULTS
ATEC Project Number 22-77032

DATE: February 12, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: Total PCB Analysis
SW 846 Method 8080

SAMPLE TAKEN BY: ATEC (DC)

DATE SAMPLED: January 29, 1988 and February 5, 1988

DATE RECEIVED: February 2, 1988 and February 8, 1988

DATE ANALYZED: February 9 and 10, 1988

ANALYST: J. Finks

*PCB identified as Aroclor 1260

**Aroclor 1260 detected below quantitation limit

<u>Sample I.D.</u>	<u>Total PCB*</u>	<u>Quantitation Limit</u>
E-W-2	<0.01 mg/100 cm ²	0.01 mg/100 cm ²
E-W-4	0.03 mg/100 cm ² *	0.01 mg/100 cm ²
T-W-1	<0.02 mg/100 cm ² **	0.02 mg/100 cm ²

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Klein
Environmental/Analytical Testing Division

REPORT OF TEST RESULTS

ATEC Project Number 22-77032

DATE: February 12, 1988

CLIENT: Roth Office Equipment Company
216 South Torrence Street
Dayton, Ohio

SAMPLE IDENTIFICATION: Fuel Scan

SAMPLE TAKEN BY: ATEC (DC)

DATE SAMPLED: January 29, 1988

DATE RECEIVED: February 2, 1988

DATE ANALYZED: February 11, 1988

ANALYST: J. Finks

*Sample identified as diesel

<u>Sample I.D.</u>	<u>Total Hydrocarbon</u>	<u>Quantitation Limit</u>
T-1	770,000 ppm*	0.5 ppm

Respectfully submitted,
ATEC Associates, Inc.

Keith S. Kline
Environmental/Analytical Testing Division

CHAIN OF CUSTODY RECORD

[illegible]

ITW FEG Troy Facility Summary

Facility Name	Facility Address ⁽¹⁾	Approximate Years of Operation	Description of Manufacturing Operations ⁽²⁾
Building M ⁽³⁾	701 South Ridge Avenue	1905 to 2000	metal heat treating
Building P	701 South Ridge Avenue	1905 through present	physical plant for the complex - no manufacturing
Plant #11	701 South Ridge Avenue	1905 to 1997	assembly, machining, painting
Plant #12	701 South Ridge Avenue	1939 to 1997	assembly, painting, sheet metal, welding
Plant #16	701 South Ridge Avenue	1957 to 2000	foundry operation
Plant #27	701 South Ridge Avenue	1960 through present	assembly, machining, painting, sheet metal, welding
Troy Castings	1041 West Main Street	1907 to 1970	foundry operation
Troy Pattern Works	701 South Ridge Avenue	1980 to 1990	fabricated patterns for foundry operation
World HQ	701 South Ridge Avenue	1969 to present	no manufacturing operations

NOTES: ⁽¹⁾ Certain buildings at the 701 South Ridge Avenue campus had separate addresses over the years but were in fact located on or directly adjacent to the campus.

⁽²⁾ A number of buildings have been demolished over the years and the only significant manufacturing operations present today are conducted in Plant 27.

⁽³⁾ Considered to be part of Plant 11 operations.

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